



DATA PROTECTION INFORMATION



DATA PROTECTION INFORMATION FOR CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

I. Overview

This section of the privacy policy provides an overview of information about the data controller, its data protection officer, the purposes and legal basis for processing your data, and your rights. Detailed information is provided in Section II.

1. Who is responsible for data processing?

Responsible within the meaning of Art. 4 No. 7 GDPR:

One Mobility Voltaira GmbH
Marktstrasse 155, Pfullingen, D-72793, Germany
Phone: +49 (0) 7121 707
Email: info@onemobility-group.com
hereinafter referred to as "we" or "us."

2. Data protection officer

You can contact our data protection officer by email: dpo@onemobility-group.com
tel. +49 151 64832458 or by post at the above address with the addition "For the attention of the data protection officer."

3. Overview of the purposes and legal basis of processing

We use your data for business development, to fulfill contractual and legal obligations, to execute the contractual relationship, to offer products and services, and to strengthen customer relationships, which may also include analyses for marketing purposes, customer satisfaction surveys, and direct advertising. If your personal data is processed for the purpose of implementing precontractual measures (e.g., to prepare offers for products or services) and to fulfill contractual obligations (e.g., to perform our services or to process orders/contracts/payments), the legal basis is Art. 6 (1) lit. b) GDPR) or if there is a legal obligation to process the data (e.g. due to tax law requirements), the legal basis is Art. 6 (1) lit. c) GDPR.

Your consent also constitutes a permission requirement under data protection law (Art. 6 (1) (a) GDPR). In this case, we will inform you about the purposes of data processing and your right of withdrawal. If the consent also relates to the processing of special categories of personal



data, we will expressly point this out to you in the consent form.

4. Obligation to provide data

Various personal data are necessary for the establishment, execution, and termination of the contractual relationship and the fulfillment of the associated contractual and legal obligations. The same applies to the use of our website and the various functions it provides. In certain cases, data must also be collected or made available due to legal requirements. Please note that it is not possible to process your request or execute the underlying contractual obligation without providing this data.

5. Your rights at a glance

We would like to take this opportunity to inform you about your rights as a data subject. These rights are standardized in Articles 15–22 of the GDPR. This includes:

- The right to information (Article 15 GDPR),
- The right to erasure (Art. 17 GDPR),
- The right to rectification (Art. 16 GDPR),
- The right to data portability (Article 20 GDPR),
- The right to restriction of processing (Article 18 GDPR),
- The right to object to data processing (Art. 21 GDPR).

To exercise these rights, please contact us or the data protection officer. The same applies if you have any questions about data processing in our company. You also have the right to lodge a complaint with a data protection supervisory authority.

II. Data processing in detail

In this section of the privacy policy, we provide you with detailed information about the processing of personal data in the context of our services.

1. What categories of data do we process, data subjects, and from which sources does the personal data originate?

The data we process is determined by the respective context and the purposes of the processing.

a) Data subjects

We process data relating to the following persons for the aforementioned purposes:

- Customers, suppliers, and business partners
- Employees of customers, suppliers, and business partners
- Employees of affiliated companies of customers, suppliers, and business partners
- Lawyers, auditors, consultants, data protection officers, and external service providers of the aforementioned persons,
- prospective customers.

b) The categories of personal data processed include:

- Account data: login/user ID and password
- Master data (title, first and last names, title, company, address)
- Job-related data (e.g., position in the company, department)
- Contact information (telephone number, mobile phone number, fax number, and email)



address, social media accounts if applicable);

- Data necessary for processing an inquiry, including creditworthiness data, if applicable
- CRM data, in particular customer history, customer statistics
- Personal data processed in the context of projects and meetings, in particular dates, times, participants, meeting content, minutes, travel, hospitality, and accommodation
- Advertising and sales data and other data from comparable categories,
- Analysis and usage data from our websites (see separate privacy policy)
- Data in the context of support requests, trouble-shooting
- Other information required for the execution of our contractual relationship or a project with our customers or sales partners (such as payment data, order data, etc.)
- Visitor management at the site, including master data and contact information, reason for visit, name of the company contact person, date, time.
- Data that we process in the context of operating a reporting office in accordance with the Whistleblower Protection Act (see separate data protection information on the whistleblower protection system)

c) Data processing within the framework of the whistleblower protection system, in particular

- Data relating to reports: As part of the whistleblower procedure, we record, among other things, the time, content, and other relevant circumstances relating to the reports submitted by whistleblowers.
- Information on relevant facts: Typical investigative measures often relate to specific facts. The investigation and evaluation of relevant information on the respective facts may, if necessary, allow conclusions to be drawn about your behavior or actions. In individual cases, this may also include breaches of duty or criminal offenses.
- Communication behavior: Investigative measures may also allow conclusions to be drawn about your communication behavior. For example, Voltaira may also access the contents of emails in your company email inbox as part of email evaluations. In addition, Voltaira may evaluate log data or metadata.
- Private content: In individual cases, data records to be evaluated may also allow conclusions to be drawn about private content relating to you. This may be the case, for example, if a report submitted by a whistleblower contains such content. However, Voltaira will take appropriate technical and organizational measures to ensure that data records with purely private content are not evaluated.
- Data on criminal convictions and offenses: As part of our investigations, we may also need to collect data about you that allows conclusions to be drawn about criminal offenses or criminal convictions relating to you. However, Voltaira will only process this data in accordance with the relevant data protection regulations, in particular Art. 10 GDPR.

d) We process personal data that we have obtained from business relationships (e.g., with customers or suppliers) or inquiries. We usually receive this data directly from the contractual partner or an inquiring person. However, personal data may also originate from public sources (e.g., commercial registers), provided that the processing of this data is permissible. Required data may also be made available to us by third-party providers and business partners, insofar as they are involved in the provision of services or commissioned by us. Data may also have been legitimately transferred to us by other companies, including affiliated companies. Depending on the individual case, we also store our own information relating to this data (e.g., in the context of an ongoing business relationship).



2. For what purposes and on what legal basis do we process personal data?

We process personal data in accordance with the provisions of the GDPR and national data protection regulations:

a) In the context of the performance of a contract or the implementation of precontractual measures (Art. 6 (1) (b) GDPR)

We process personal data primarily for the fulfilment of contractual obligations and the provision of related services or in the context of initiating a contract (e.g., contract negotiations, preparation of offers). The specific purposes depend on the respective service or product to which the business relationship or contract initiation relates, in particular in connection with orders from customers and orders from suppliers and service partners. We also process your data in connection with the services provided, in particular invoicing, accounts receivable management, dunning, and debt collection.

Data processing serves the following purposes in particular:

- Initiation, execution, and processing of orders
- ERP: From consulting and planning to implementation and operation of regionally and globally distributed ERP landscapes
- IT security services
- License management and billing
- IT consulting
- Management of customer data used for processing payments and, where applicable, credit checks.
- Communication with customers, service providers, subcontractors, business partners, and authorities
- Support, in particular responding to inquiries from our contacts, interested parties, customers, or partners
- Organization and implementation of training courses, workshops, and certifications
- Conducting internal and external audits on our behalf
- Organization and planning, implementation, and management of the business relationship between us and our customers and partners as well as our affiliated companies

b) To safeguard legitimate interests (Article 6(1)(f) GDPR)

Where necessary, we process your data beyond the actual fulfillment of the contract to protect our legitimate interests or those of third parties, namely:

- For direct marketing of our own similar goods or services to existing customers in accordance with Section 7 (3) UWG (German Unfair Competition Act), provided that we have received your email address in connection with the sale of a product or service from the customer, the customer has been informed of this and has not objected to its use.
- Data processing for security, quality assurance, and process optimization: We process the data collected in the course of contract execution within the legally permissible scope for (data) security purposes (e.g., for the purpose of detecting criminal offenses or misuse), for the creation of statistics, and for quality assurance, process optimization, and planning reliability.
- Credit checks and fraud prevention
- Settlement of legal disputes, enforcement of existing contracts, and assertion, exercise, and defense of legal claims
- Maintaining and protecting the security of our systems and the company's IT operations



- Measures for building and facility security (e.g., access control or video surveillance)
- Exchange of control and planning data, key figures with affiliated companies and their consultants and service providers.
- Credit checks

c) Due to legal obligations (Art. 6 (1) (c) GDPR)

The purposes of processing include, among other things, the fulfilment of tax and social security control and reporting obligations. This also includes statutory reporting obligations in connection with the provision of services and secondment in accordance with the A1 procedure; see also section 5. It also includes the processing of personal data to the extent necessary for the implementation of technical and organizational measures in accordance with Art. 32 GDPR. We also process your data in the context of operating a reporting office and reporting and investigations in accordance with the Whistleblower Protection Act (HinSchG); separate data protection notices apply to these.

d) Based on your consent (Article 6(1)(a) GDPR)

If you have given us your consent in individual cases to process personal data for specific purposes (e.g., film and photo recordings, newsletter subscription, consent to direct marketing and electronic advertising, or consent to customer satisfaction surveys, for example), the lawfulness of this processing is based on your consent. You may revoke your consent at any time with effect for the future.

e) Whistleblower protection system

Legal obligation to introduce a whistleblower protection system: We are legally obliged to introduce a whistleblower protection system (Art. 6 (1) (c) GDPR in conjunction with § 10 HinSchG).

Investigation of misconduct: Investigative measures may serve to uncover and investigate possible breaches of employment contract obligations or criminal offenses committed by Voltaira employees in the performance of their duties, as well as other rule violations and abuses within the company. This concerns, for example, the detection and punishment of fraud, corruption, tax offenses, antitrust violations, money laundering, or other economic crimes, as well as violations of Voltaira's code of conduct. The legal basis for this is Art. 6 (1) (c) GDPR in conjunction with § 10 Hin-SchG.

Exercise of legal rights: Investigative measures may also serve to compensate for and defend against imminent economic or other damage or disadvantages for Voltaira and thus to effectively defend, exercise, and enforce rights (Article 6(1)(f) GDPR).

Review of relevance for affiliated companies: Voltaira will forward reports from whistleblowers that may also concern affiliated companies to these companies. The processing of your data also serves, among other things, to check whether a corresponding data transfer is necessary in individual cases. The legal basis for this is the legitimate interests of Voltaira and its affiliated companies (Art. 6 (1) (f) GDPR).



3. Postal advertising / telemarketing

We collect and process your address data and customer segment for our own marketing purposes and for the marketing purposes of our affiliated companies. Furthermore, we are entitled, in compliance with legal provisions, to store and use additional information, e.g., from your previous orders, in order to send you advertising that is as tailored as possible to your needs and interests. Any additional data stored that has not been mentioned previously will not be passed on.

We also process telephone numbers for telemarketing purposes. In some cases, we also use external service providers who contact you by telephone on our behalf.

The data is processed on the basis of Article 6(1)(f) GDPR. You can object to the use and disclosure of your data for advertising purposes at any time.

4. Who receives my data?

Within Voltaira, those persons who need your personal data to fulfill our contractual and legal obligations or to protect legitimate interests have access to it.

We may transfer personal data to courts, supervisory authorities, or law firms to the extent that this is legally permissible and necessary to comply with applicable law or to assert, exercise, or defend legal claims.

Furthermore, service providers and vicarious agents employed by us may receive data for these purposes. We may only disclose information about you if required to do so by law, if you have given your consent, if we are legally authorized to disclose or transfer the information, and/or if the processors commissioned by us equally guarantee compliance with confidentiality and the provisions of the General Data Protection Regulation and the Federal Data Protection Act.

Under these conditions, the following recipients may receive data:

- Affiliated Voltaira companies in the context of management, financial controlling, and reporting, or the processing of data as a processor
- Affiliated companies in the context of global task fulfillment and reporting
- Affiliated companies in the context of intercompany order processing
- Customers, suppliers, and business partners, as well as authorities within the scope of order processing
- Processors, in particular cloud services
- IT service providers in the context of (remote) maintenance of IT systems
- Subcontractors for order fulfillment,
- Customers and suppliers in the context of business correspondence and order documentation
- Auditors
- Credit rating service providers
- Data destruction service providers
- Courts and arbitration tribunals in legal disputes
- Police, law enforcement, and customs authorities
- Public authorities for the fulfillment of legal notification obligations, e.g., tax authorities, competent authorities in A1 proceedings
- Lawyers, tax advisors, and auditors
- Information security and data protection officers
- Works council, insofar as it is required to be informed within the scope of its tasks, rights, and obligations to monitor the implementation of laws, collective agreements, and existing



works agreements

- Debt collection service providers
- Banks, payment card processors (credit cards), and payment service providers
- Telephony providers
- Insurance

Whistleblower protection

- **Affiliated companies:** In order to investigate possible compliance issues, we may also need to transfer your data to other affiliated Voltaira companies. Such internal data transfers are particularly likely to occur if the investigation measures are based on facts that affect several or other affiliated companies.
- **Courts, authorities, and other public bodies:** Voltaira may also disclose the results of investigations to public bodies. This includes German or foreign public prosecutors, courts, or other authorities. Such disclosure may be necessary in particular if Voltaira is legally obliged to disclose the relevant data. This may be the case, for example, in the context of criminal investigations initiated as a result of investigations.
- **Other third parties:** If this is necessary to carry out the purposes stated in this privacy policy and no conflicting interests of data subjects that are worthy of protection prevail, your personal data may also be disclosed to opposing parties in legal proceedings or to insurance companies.

5. Is your data transferred to a third country?

Data will only be transferred to countries outside the EU or the EEA (so called third countries) if this is necessary for the execution of your orders (e.g., material procurement, manufacturing, delivery, logistics) or if it is required by law (e.g., tax reporting obligations), if you have given us your consent, or in the context of order processing.

We also transfer data to affiliated companies to protect legitimate interests. In the event of the transfer of personal data to third countries, we ensure an adequate level of data protection in accordance with the principles set out in Art. 44 ff. GDPR. This means that processing is carried out, for example, on the basis of special guarantees, such as the officially recognized determination of a level of data protection equivalent to that of the EU or compliance with recognized special contractual obligations (so called "EU standard contractual clauses"). Alternatively, in the context of data exchange with certified providers under the EU-US Data Privacy Framework.

When providing services and posting employees (A1 procedure), we may be required to transfer personal data about our customers and/or clients or the workplace to the competent authorities in accordance with statutory reporting requirements.

6. How long will my data be stored?

We process and store your personal data for as long as it is necessary to fulfill our contractual and legal obligations. We delete your personal data as soon as it is no longer required for the above-mentioned purposes. In doing so, personal data may be retained for the period during which claims can be asserted against our companies (statutory limitation periods of three or up to thirty years).

We also store your personal data if we are legally obliged to do so. Corresponding documentation and retention obligations arise from commercial, tax, and social security regulations. We also store business-related documents and emails for the purpose of legally compliant archiving for tax purposes and documentation to defend against unjustified claims and enforce claims.



The storage period for tax and commercial law purposes is generally 6 or 10 years from the end of a fiscal year, in accordance with § 147 AO (German Fiscal Code) and § 257 HGB (German Commercial Code). Corresponding documentation and retention obligations arise in particular from § 11 (5) HinSchG (German Information Security Act) and amount to three years.

7. Obligation to provide data

We process your personal data to the extent necessary to fulfill our contractual and legal obligations and to protect our legitimate interests, or if you have given us your consent. In the context of the execution or initiation of a contract, you must provide the personal data necessary for the fulfillment of the contract or the implementation of pre-contractual measures and the associated obligations. Furthermore, you must provide the personal data that we are legally obliged to collect. Without providing this data, we will not be able to conclude or fulfill a contract with you.

In cases of data collection based on consent, the provision of data by you is voluntary and not mandatory.

8. To what extent is there automated decision-making (including profiling)?

As a matter of principle, we do not use fully automated decision-making in accordance with Article 22 GDPR to establish and implement the business relationship. Profiling does not take place. Separate data protection declarations apply to the use of the websites.

9. What data protection rights do I have?

You have the following rights vis-à-vis us as the controller. If you wish to assert your rights or require further information, please contact us or our data protection officer:

a) Rights under Art. 15 ff. GDPR

The data subject has the right to request confirmation from the controller as to whether personal data concerning him or her is being processed. If this is the case, he or she has the right to access this personal data and to the information specified in detail in Art. 15 GDPR. Under certain legal conditions, you have the right to rectification under Article 16 GDPR, the right to restriction of processing under Article 18 GDPR, and the right to erasure ("right to be forgotten") under Article 17 GDPR. In addition, you have the right to receive the data you have provided in a structured, commonly used, and machine-readable format (right to data portability) in accordance with Article 20 GDPR, provided that the processing is carried out using automated procedures and is based on consent in accordance with Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant to Art. 6(1)(b) GDPR. The restrictions pursuant to Sections 34 and 35 BDSG apply to the right of access and the right to erasure.

b) Revocation of consent

If the processing is based on consent given to us, e.g. for film and photo recordings, you can revoke your consent to the processing of personal data at any time (Article 7(3) GDPR). The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until revocation. The data subject will be informed of this before giving consent.

c) Right to lodge a complaint

Without prejudice to any other administrative or judicial remedy, you have the option of lodging a complaint with us at or with a competent data protection supervisory authority (Article 77 GDPR in conjunction with Section 19 BDSG).



Right to object under Article 21 GDPR

In addition to the aforementioned rights, you have the right to object as follows:

Right to object in individual cases

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(f) GDPR (data processing based on legitimate interests); This also applies to profiling based on this provision within the meaning of Article 4(4) GDPR, where applicable. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

Right to object to the processing of data for advertising purposes

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data concerning you for such marketing purposes; this also applies to profiling insofar as it is related to such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes. The objection can be made informally to the address specified in section 1.