

DATA PRIVACY NOTICE OF SEFE ENERGY GMBH GROUP ACCORDING TO ART. 13, 14 AND 21 GDPR

Date: June 2024

The following notice describes how and for what purpose SEFE Energy GmbH, the companies affiliated with it directly or indirectly or structurally listed below (hereinafter also referred to as 'we') of the SEFE Energy GmbH Group process personal data of their business partners and their employees.

Personal data is, according to Art. 4 No. 1 of the General Data Protection Regulation (GDPR), any information relating to an identified or identifiable natural person.

1. RESPONSIBILITY FOR DATA PROCESSING AND CONTACT DETAILS

The controller within the meaning of Art. 4 No. 7 GDPR for the processing of your personal data is SEFE Energy GmbH, or one of the following structurally affiliated companies of the SEFE Energy GmbH Group with which you are in contact or have a business relationship:

Shared responsibility:

In addition, all the companies mentioned are jointly responsible with SEFE Energy GmbH for the processing of your data. This means that you can assert your data protection rights against any of these companies.

Contact details of the person responsible:

SEFE Energy GmbH, Königstor 20, 34117 Kassel, Germany
Phone: +49 561 99858 0
email: info@sefe-energy.de

SEFE Energy Holding GmbH, Königstor 20, 34117 Kassel, Germany
Phone: +49 561 99858 0
email: info@sefe-energy.de

SEFE Energy Holding GmbH, Vienna branch office, Am Belvedere 10, 1100 Wien, Austria;
Phone: +43 1 890 710
email: info@sefe-energy.at

SEFE Energy GmbH, organizační složka Česká republika, Lomnického 1705/7, 140 00 Praha 4, Czech Republic
Phone: + 420 226 230 332
email: info@sefe-energy.cz

WINGAS Benelux BV/SRL, Büro Belgien, 23, Square de Meeûssquare (4th.floor), B-1000 Bruxelles/Brussel, Belgium
Phone +32 2 200 00 71
email: contact@sefe-energy.be

WINGAS Benelux BVBA Büro Niederlande, Sir Winston Churchillaan 299a, 2288 DC Rijswijk, Netherlands
Phone: +31 885 530 6286
email: contact@sefe-energy.nl

Industriekraftwerk Greifswald GmbH, Königstor 20, 34117 Kassel, Germany
Phone: +49 561 99858 0
email: info@sefe-energy.de

Contact details of the data protection officer:

You can reach our data protection officer at

SEFE Energy GmbH, attn: Data Protection Officer, Königstor 20, 34117 Kassel, Germany or all companies with regard to data protection at dataprivacy@sefe.eu

2. TYPE OF PROCESSED DATA

We process the following examples of personal data or categories of personal data listed below that we receive from you and your employees in the course of our business relationship and for which their processing is necessary:

- **Master data:** surname, first name, title, function/position in the company, business contact data (phone number, business mobile phone number, business fax number, business e-mail address)
- **Communication data:** content of contact requests, meeting notes, technical usage data for communication by e-mail and telephone,
- **Business data:** Documentation of business transactions, Voice recordings of calls/customer transactions (following prior information and consent),
- **Event related data:** travel data, preferences (e.g. food), other information in the context of events,
- **Data protection relevant data:** declarations of consent, data protection requests, objections.

3. DURATION OF DATA STORAGE

We only store your data for as long as is necessary to fulfill our contractual and legal obligations or for as long as we have your consent to do so.

4. PURPOSES OF DATA PROCESSING AND LEGAL BASIS

We process your personal data in accordance with the relevant data protection regulations, in particular the General Data Protection Regulation (GDPR), the Federal Data Protection Act

(BDSG) and the Telecommunications Telemedia Data Protection Act (TTSG).

We process your personal data for the following purposes and based on the legal basis stated in each case:

- **Administration of the business relationship:** communication, initiation and execution of transactions (Art. 6 para. 1 lit. b GDPR).
- **Direct marketing:** Only with your consent (Art. 6 para. 1 lit. a GDPR).
- **Events:** Organisation and implementation (Art. 6 para. 1 lit. b, f GDPR).
- **Quality assurance and proof:** Voice recordings only with consent (Art. 6 para. 1 lit. a GDPR).
- **Protection of legitimate interests:** Legal defense, IT security (Art. 6 para. 1 lit. f GDPR).
- **Consent management:** Documentation of consents and objections (Art. 6 para. 1 lit. c GDPR).
- **Answering enquiries:** Processing your data protection enquiries (Art. 6 para. 1 lit. c GDPR).
- **Online meetings:** Conducting online meetings via MS Teams/Webex/Zoom to initiate and conduct the business relationship (Art. 6 para. 1 lit. b, f GDPR)
- **Market and opinion research:** Addressing you as part of our market and opinion research and analysing your responses, only with your consent (Art. 6 para. 1 lit. a GDPR)

5. RECIPIENTS AND CATEGORIES OF RECIPIENTS

Your data may be forwarded to:

- Processors (cf. Art. 4 No. 8, 28 GDPR): Service providers who process data on our behalf (e.g. IT service providers).
- Other companies directly or indirectly affiliated with SEFE Energy GmbH from the SEFE Group for joint customer support and business processing, insofar as this is useful and/or necessary for the fulfilment of our business purposes and for the optimal support of our customers and suppliers.
- Public bodies: If required by law.
- External advisors: such as lawyers or tax advisors if this is necessary to protect our rights or legitimate interests.

6. DATA PROCESSING WITHIN THE GROUP

In order to fulfil our business purposes and to provide optimal support to our customers and suppliers, it is necessary to process your personal data within the group. This only takes place if there is a legal basis for this (e.g. Art. 6 para. 1 lit. b or f GDPR).

Access authorisations:

Within the SEFE Group, those companies and functions that require your data to fulfil their tasks will have access to it; this requires an internal exchange of the relevant data within the Group in order to ensure optimal service provision and cooperation. This includes both internal SEFE processing, in particular to improve internal Group customer support and sales management, e.g. through the joint use of customer data for an optimally customised offer, as well as access by internal Group service providers who support us in various areas. These can be, for example, IT service providers for the maintenance of our systems, accounting for the processing of payment transactions or HR departments for the administration of employee data.

Purpose limitation:

The use of your data within the Group is always for a specific purpose and in compliance with the applicable data protection regulations. We ensure that your data is only processed for the purposes required in each case and that appropriate technical and organisational measures are taken to protect your data.

Transparency and control:

We emphasise transparency and inform you about the processing of your data within the Group. You have the right to request information about the processing of your data and to assert your data protection rights at any time.

7. INTERNATIONAL DATA TRANSFER

It may be necessary to transfer your data to countries outside the European Union (EU) or the European Economic Area (EEA) as part of our business activities and internal group co-operation. We ensure that these transfers only take place in compliance with the strict requirements of Art. 44 et seq. GDPR.

Transmission within the SEFE Group:

We only transfer your data to other SEFE Group companies outside the EU/EEA on the basis of binding internal data protection regulations and using EU standard contractual clauses approved by the European Commission.

Transfer to third parties outside the EU/EEA:

If we transfer your data to third parties outside the EU/EEA (e.g. to IT service providers), this will only take place if

- there is an adequacy decision by the EU Commission for the country in question
- suitable guarantees exist (e.g. standard contractual clauses), or
- you have expressly consented to this.

8. AUTOMATED DECISION MAKING AND PROFILING

We do not use your personal data for automated decision-making, including profiling.

9. DATA SUBJECT RIGHTS

You can freely withdraw your consent under data protection law at any time with effect for the future; we will point this out in more detail when you give your consent. Processing carried out prior to a revocation remains unaffected by the revocation.

You have the right to request information about your personal data that we process at any time. If your personal data is incorrect or incomplete, you have the right to rectification and completion. You can request the deletion of your personal data at any time unless we are legally obliged or entitled to continue processing your data. If the legal requirements are met,

you can request that the processing of your personal data be restricted.

If processing is carried out on the basis of your consent or as part of a contract, you have the right to transfer the data you have provided, provided that this does not affect the rights and freedoms of other persons.

You have the right to lodge questions or complaints with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. Alternatively: Depending on the location, different supervisory authorities are responsible for the SEFE Energy GmbH Group companies in the respective countries.

10. RIGHT TO OBJECT PURSUANT TO ART. 21 GDPR

You have the right to object at any time to the processing of your data, which is carried out on the basis of a weighing of interests or in the public interest, if there are reasons arising from your particular situation. In the event of an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. In the event that we process your personal data for the purpose of direct advertising and you do not wish to receive any advertising, you have the right to object to this processing at any time. We will take this objection into account for the future. The objection can be made informally and should be addressed to SEFE Energy GmbH, keyword: DATA PRIVACY, Königstor 20, 34117 Kassel, Germany or by e-mail: dataprivacy@sefe.eu