

Privacy Notice for the Voluntary Prize Draw as Part of the Customer and Partner Feedback

As part of the customer and partner feedback, ASC Technologies AG assesses the satisfaction of its customers and business partners with its products, services and cooperation. Participation in the survey is completely anonymous. If you choose to participate voluntarily in the prize draw, personal data relating to you will be collected and processed.

Against this background, we provide the following information pursuant to Articles 12 and 13 of the European General Data Protection Regulation regarding the processing of your personal data.

1. Name and Contact Details of the Controller

Your contact as controller within the meaning of the European General Data Protection Regulation (hereinafter referred to as the "GDPR"), the German Federal Data Protection Act, other data protection laws of the Member States and other data protection provisions is:

ASC Technologies AG
Seibelstrasse 2-4
63768 Hösbach
Germany

Telephone: +49 6021 5001 0
Email: hq@asctechnologies.com

(hereinafter referred to as "we", "us" or "our")

2. Name and Contact Details of the Legal Representative

The legal representative within the meaning of Section 78(1) of the German Stock Corporation Act (AktG) is the Management Board of ASC Technologies AG, represented by

Günter Müller, Marco Müller and Dr Gerald Kromer.

Telephone: +49 6021 5001 0
Email: hq@asctechnologies.com

3. Data Protection Officer

If you have any questions about the processing of personal data concerning you or wish to exercise your rights as a data subject, please contact our internal Data Protection Officer:

Kilian Haßkerl
Seibelstrasse 2-4
63768 Hösbach
Germany

Telephone: +49 6021 5001 316
Email: data.protection@asc.de

4. Your Rights as a Data Subject

Under the GDPR, you have the following rights:

- Right of access pursuant to Article 15 GDPR: You may request information about the personal data we process. This includes, in particular, information about (i) the purposes of processing, (ii) the categories of personal data, (iii) the categories of recipients, (iv) the storage period, (v) the existence of a right to rectification, (vi) erasure, (vii) restriction of processing or objection, (viii) the existence of a right to lodge a complaint, (ix) the source of your data where it was not collected from you, and (x) the existence of automated decision-making, including profiling, and, where applicable, meaningful information about its details;
- Right to rectification pursuant to Article 16 GDPR: You may request the immediate correction of inaccurate data or completion of incomplete data;

- Right to erasure pursuant to Article 17 GDPR: You have the right to request the erasure of your personal data, provided that processing is not necessary (i) to comply with legal obligations, (ii) for reasons of public interest or (iii) for the establishment, exercise or defence of legal claims;
- Right to restriction of processing pursuant to Article 18 GDPR: You may request restriction of processing if (i) you contest the accuracy of the data, (ii) the processing is unlawful, (iii) you oppose erasure, (iv) we no longer need the data or (v) you have objected pursuant to Article 21 GDPR;
- Right to data portability pursuant to Article 20 GDPR: You have the right to receive the personal data you have provided in a structured, commonly used and machine-readable format or to request transmission to another controller;
- Right to object pursuant to Article 21 GDPR: You may object at any time to the processing of your personal data where such processing is based on Article 6(1)(e) GDPR (public interest) or Article 6(1)(f) GDPR (legitimate interests);
- Automated individual decision-making, including profiling, pursuant to Article 22 GDPR: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- Right to lodge a complaint with a supervisory authority pursuant to Article 77 GDPR: You may lodge a complaint with a data protection supervisory authority if you believe that the processing of your personal data infringes the GDPR.

If you wish to exercise your right to lodge a complaint, you may contact the supervisory authority responsible for us:

Bavarian State Office for Data Protection Supervision (BayLDA)
Promenade 18
91522 Ansbach
Germany

Telephone: +49 981 180093 0
Fax: +49 981 180093 800
Email: poststelle@lda.bayern.de

5. **Right to Withdraw Consent**

You have the right to withdraw consent granted to us at any time pursuant to Article 7(3) GDPR. Withdrawal applies only for the future and does not affect the lawfulness of processing carried out before the withdrawal. Following withdrawal, the data concerned will be erased pursuant to Article 17(1)(b) GDPR.

6. **Use of the Form for Data Subject Requests**

If you submit a data subject request to us via the request form, your personal data will be stored for the purpose of contacting you, subsequently responding to your request and retaining evidence of its handling. This involves the following personal data:

- First and last name,
- Email address,
- Other data entered by you voluntarily.

These data are stored for the specified purpose and erased once the purpose, namely the handling and exercise of your data subject request, no longer applies. The legal basis is compliance with a legal obligation pursuant to Article 6(1)(c) GDPR in conjunction with Article 12 and Articles 15 to 22 GDPR and Section 34(2) of the German Federal Data Protection Act (BDSG).

7. **Categories of Personal Data Processed**

As a rule, the following categories of personal data are collected from and processed for each person who voluntarily chooses to participate in the prize draw:

- Master data (e.g. first and last name),
- Contact details (e.g. email address),
- Technical data (e.g. information about activation of the link contained in the email that leads to the survey form),
- Content data (data and information that you enter yourself in the optional input fields);

If participation in the prize draw is successful, the winner will be contacted personally using the email address provided. Accordingly, content data disclosed by the winner in the course of email correspondence will also be processed. In addition, the winner's postal address will be collected to enable delivery of the prize.

8. Purposes and Legal Bases of Data Processing

The following overview sets out the purposes for which the personal data collected from you are processed and the relevant legal basis applicable to each purpose:

Purpose of data processing	Legal basis
Conducting the prize draw (receiving and administering entries, drawing or determining the winners, notifying them and delivering the prize)	Article 6(1)(a) GDPR (your consent) or Article 6(1)(b) GDPR (performance of a contract; collection and processing of the personal data are necessary to conduct the prize draw in accordance with its terms and conditions)
Prevention of misuse (checking compliance with the terms and conditions of participation and preventing multiple entries, automated entries, e.g. by bots, and other attempts at manipulation)	Article 6(1)(f) GDPR (legitimate interest in ensuring equal opportunities for all participants, proper and manipulation-free conduct of the prize draw, and prevention of harm to participants)
Compliance with legal obligations (e.g. tax and commercial-law documentation and retention requirements relating to the award of prizes)	Article 6(1)(c) GDPR in conjunction with Section 147 of the German Fiscal Code (AO) and Section 257 of the German Commercial Code (HGB)
Legal defence (assertion and defence of claims in disputes concerning participation or a prize)	Article 6(1)(f) GDPR (legitimate interest in enforcing claims and defending ourselves against unjustified claims)

9. Storage and Erasure of Your Personal Data

As a rule, we store your personal data only for as long as necessary for the purposes stated above or until those purposes cease to apply (Article 17(1)(a) GDPR), or until you withdraw consent that you voluntarily granted before the initial collection or processing of the data (Article 7(3) GDPR), or object to the processing (Article 21(1) GDPR), unless overriding grounds require continued processing.

The applicable retention period also varies depending on the defined purpose:

Purpose of data processing	Retention period
Conducting the prize draw	Until completion of the prize draw, i.e. after determination and notification of the winner and delivery of the prize
Prevention of misuse	Up to 30 days after the end of the prize draw
Compliance with legal obligations	Six or eight years (only for tax-relevant documents pursuant to Section 147 AO and Section 257 HGB)
Legal defence	Three years from the end of the year in which the prize draw ended, pursuant to Sections 195 and 199 of the German Civil Code (BGB)

10. Recipients of Personal Data

10.1 Internal Recipients of Your Data

Your personal data are processed in particular by the Marketing department, which is responsible for organising, conducting and administering the prize draw. Personal data are also disclosed internally to Sales, Quality Management and the Management Board, which jointly evaluate the prize draw.

10.2 External Recipients of Your Data

Once the winners have been determined, the prize will be sent to each recipient by post. To enable logistical delivery, your master data and contact details will be transferred to a postal service provider. The postal service provider acts as an independent controller, meaning that no data processing agreement is required.

As the above-mentioned survey is addressed to all ASC customers and business partners, your personal data may be transferred to a Member State of the European Union (EU), the European Economic Area (EEA) or a third country if you are established there and are a winner. If personal data are transferred to a third country for which the European Commission has not adopted a valid adequacy decision, ASC will implement appropriate safeguards pursuant to Article 46 GDPR to protect your personal data, for example by entering into the European Commission's standard contractual clauses pursuant to Article 46(2)(c) GDPR.

11. No Automated Decision-Making

ASC does not make decisions based solely on automated processing within the meaning of Article 22 GDPR. In particular, no automated decision is made that produces legal effects concerning you or similarly significantly affects you.