

PEDOLA Technologies GmbH Customer Data Privacy Statement

Updated June 27

Introduction

It is essential that the user's personal data is handled carefully and appropriately by PEDOLA Technologies GmbH (hereinafter referred to as "PEDOLA" or "us"). We process your personal data in compliance with data protection regulations and good data management and processing practices and ensure that your privacy is not compromised. Processing your personal data allows us to serve you better. We collect and use personal data to produce products and services, and to develop and offer new services. This allows us to better respond to your needs. We may periodically change our data protection measures as we develop our Services or as legislation changes. You can find the latest version of our data protection practices on this page.

In this Privacy Statement, we describe in more detail, for example:

- The kinds of data collected about our customers and users of our website Services
- Purpose of using the data
- How long the data will be stored
- How cookies are used in the service
- Opportunities for customer and user influence

We recommend that users read our Privacy Statement. Users agree to the terms of this Privacy Statement and then use our services.

Additional Information:

When processing customers' personal data, PEDOLA always adheres to the basic principles of the General Data Protection Regulation (GDPR):

- Personal data must be processed in a lawful, fair and transparent manner in relation to the data subject ("Legality, Fairness and Transparency")
- Personal data must be collected for clear, unambiguous and lawful purposes and must not be further processed in a manner inconsistent with those purposes ("Purpose Restriction")
- Personal data shall be sufficient, relevant and limited to those necessary for the purposes for which it is processed ("data minimization")
- Personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data is deleted or corrected taking into account the purpose of processing ("Accuracy")
 - Personal data should be kept in a form that allows identification of the data for no longer than is necessary to process the personal data ("Storage Limits")
- Personal data shall be processed in such a way as to ensure appropriate security of the protection of personal data using appropriate technical or organisational measures ("integrity and confidentiality"), including protection against unauthorized or unlawful processing and

accidental loss, destruction or damage.

For what purpose do we collect personal data?

We collect your personal data to enable us to provide you with high-quality and personalized products and services, as well as better customer service. We want to continuously improve quality and grow our business. Your personal data may be used to develop our products, services, customer service, sales and marketing.

We also use your personal data for our user communications. For example, we may send you information about Announcements and notices of changes to our products and services. We may use your personal data for the marketing of our products and services and for market research and with your permission or consent. We may further use your personal data to target our products and services to you, for example, to recommend or display targeted content on our services.

With your consent and to the extent permitted by law, we may also combine data collected in relation to our specific products and/or services with data collected in relation to our other products and/or services.

Additional Information:

We process data in accordance with data protection legislation on the following grounds:

- **Contracts:** We process the data you provide to perform contractual services or to provide you with products or services that you have ordered.
- **Consent:** We may process data provided or observed by you on the basis of your consent, or for marketing measures, etc., based on legitimate interests as described below. We may also ask for your consent if the purpose of processing changes.
- **Legitimate Interests:** We process your data to manage and develop customer service, secure customer activity, implement the service, conduct business, prevent and detect abuse, and conduct marketing. We believe these goals are critical to our business and therefore in our legitimate interests.
- **Statutory Obligations:** We may be obligated to store some of your personal information to comply with accounting or other legislation. In this case, the processing of your personal data is based on compliance with statutory obligations.

What data do we collect?

We only collect personal data that is necessary for your pre-determined purposes. The purpose is to define what kind of data is collected and under what circumstances. When we collect personal data, we tell you what data is required to use the service and what data you can consent to provide.

User-Provided Data or Personally Identifiable Information: We collect User-Provided Data, such as for the purpose of delivering and invoicing orders or services, managing and

developing customer accounts, and conducting marketing and opinion surveys. We cannot provide products or services ordered by users without contact or invoicing data. We may also collect other user data to adjust our content and marketing to better match customer preferences. The following are examples of user-provided data or otherwise personally identifiable information:

- Data related to identifying and authenticating a person, such as name and personal identification code
- Contact details such as name, address, phone number, email address
- Information about customer relationships, such as invoice and payment information, product and order information, customer feedback, inquiries and cancellations
- Analyze user-provided information and interests
- User License and Consent
- Enter data in questionnaires and surveys
- Data required to comply with legal obligations
- Other information collected with the user's consent

Data observed by using the service:

We automatically collect data through cookies and similar technologies, which help us understand the number of users of our services, what content and advertisements are popular, and how much time users spend viewing content and advertisements. This data helps us develop our services and business, tailor content based on areas of potential interest to users, target advertising and marketing communications, and prevent and detect abuse.

These data include,

- Use and browse data related to service features
- User visits to our website and website versions
- the type of equipment used
- Personal device and/or cookie ID
- Browser and browser version
- IP address
- time and duration of browsing
- operating system
- Other information collected with the user's consent

Data exported using the service:

By using analytics, we can determine, for example, likely areas of interest to users based on data observed through the service and/or data given by the users themselves, and group users into specific groups of users. We use this data for statistics and analysis, to develop services and businesses, and to customize content, advertising and marketing messages.

If we use the data for purposes other than those described above, we ensure that the

processing is compatible with the purpose for which the data was originally collected.

How do we collect personal data?

We mainly collect personal data directly from users, either verbally or in writing. Personal data of users is collected when they become customers of our website, in connection with the sale and use of products and services, and also in connection with marketing activities and the conduct of business by users with us. Users provide us with data, for example, when they request services, participate in surveys or ad campaigns, or answer questions about the services we provide. Data can also be observed or derived through the use of services. Data may be collected by us or our partners through missions.

In addition, we obtain information from credit information and customer default registers as well as other reliable public or private registers, such as business information systems.

We may use cookies (small text files stored on your device) on our website to ensure that our services work as well as possible.

Use of Cookies:

We use cookies (small text files stored on your device) to provide and develop our services. We also use cookies to personalize content and target advertising. Cookies provide us with a better opportunity to present users with the latest personalized services based on their interests. Cookies also support the following functions: login and authentication, saving of personal settings and specifications, analysis of website operation and fraud prevention. When you use our web services, cookies collect data such as: IP address, the links you use, the advertisements and other content you browse, the websites you have previously browsed and the websites you have visited, the time of your visit, the time you are visiting The browser or application used and other similar information. Our website and services may contain third-party session cookies.

We use session cookies and persistent cookies. Session cookies are temporary, i.e. they only exist when you visit a website and are automatically deleted when you close your browser. Persistent cookies remain on your computer for a certain period of time, even after the session ends, unless you delete them yourself before then. Cookies do not harm your device or files. You can adjust your cookies, for example through your browser settings. Further information on cookies is contained in each browser's data protection or documentation.

How do we process your personal data?

We process your personal data in accordance with the General Data Protection Regulation (GDPR), respecting your rights and freedoms. We ensure compliance with data protection principles at all stages of personal data processing.

Your data may only be processed by PEDOLA employees or partners authorized to process personal data. We ensure employee awareness and knowledge of data protection through continuous training and up-to-date guidelines. Your personal data may be processed by

several IT systems managed by PEDOLA or its partners.

How do we protect your personal data?

As far as the processing of personal data is concerned, we have put in place appropriate technical and organizational measures for implementing the data protection principles. These measures include the use of firewalls, encryption techniques, the safe use of IT areas, appropriate access controls, restricting the rights granted to users and monitoring their use, providing instructions to those involved in the processing of personal data and careful selection of subcontractors.

Who do we disclose your personal data to?

In principle, we will not disclose your personal data. PEDOLA may purchase certain personal data processing services from partners. We have selected as our partners only personal data processors that comply with good personal data processing practices, employ appropriate technical and organizational measures, meet the requirements of the GDPR and ensure the exercise of your rights.

Sign written contracts with all partners specifying the object, purpose and duration of the processing of personal data, as well as the agreed personal data to be processed. In addition, personal data is disclosed at specific times based on current legislation in response to statutory requirements by competent authorities or otherwise.

Do we disclose your personal data outside the European Union or European Economic Area?

In principle, we only process your personal data within the European Union or European Economic Area.

In certain exceptional circumstances, if we transfer personal data outside the European Union or the European Economic Area, we ensure adequate personal data protection, inter alia, with regard to the confidentiality and processing of personal data, such as using standards approved by the European Commission. The contractual terms are legislated otherwise personal data will be processed in accordance with this Privacy Statement.

How long do we keep your personal data?

The storage period of personal data is based on the law and the data protection principles of PEDOLA. In accordance with the law in force at the time, we only retain your data as necessary for the purposes described in this Privacy Statement. We store your data for as long as the customer relationship lasts. After the customer relationship ends, the storage period depends on the data and its purpose. We may be obliged to store some of our customers' personal data following the end of a customer relationship or other reasons for processing personal data in order to comply with accounting or other legislation.

We strive to keep the personal data we hold correct and up-to-date by removing unnecessary data and updating outdated data.

Client's rights

You have the right to access data about you, the right to request rectification of inaccurate or incomplete data, and the right to delete registration data that is unnecessary or outdated for the purposes of processing.

You also have the right to object to our use of your data in direct marketing and market research and opinion surveys by contacting the controller or changing the settings in the web service. You can also block ads targeted to you based on your web browsing behavior. After this blocking, you'll see the same number of ads as before, but the ads won't be targeted based on your area of interest.

Customer has access to data

Under the GDPR, you have the right to receive a copy of your personal data. There is no legally required form for making this request. If necessary, we may ask you to provide additional data to confirm your identity.

If you make a request for rights electronically, we will provide the data in the usual electronic format. In principle, there is no fee for completing the request, but in some cases we may charge administrative fees for carrying out the requested process, or we may refuse to carry out the requested process.

Under the GDPR, the time limit to respond to your request is one month. If necessary, this time limit may be extended by up to two months, taking into account the complexity and volume of requests.

The right to rectification and the "right to be forgotten"

With certain exceptions, the GDPR guarantees you the right to rectify your data and the right to delete your personal data, the "right to be forgotten". You also have the right to revoke the consent on which your processing is based. In this case, you can make a request to us to delete the data concerning you from our system. If there is no other legal basis for processing personal data, we will delete it. If our partner has data that is to be corrected or deleted, we require the partner to follow the same procedure.

The right to portability of your data from one system to another

Under the GDPR, you have the right to port data from one system to another. In effect, you have the right to obtain data about you in the usual transmission formats and deliver it to other controllers. Processing is required by law to be based on consent or agreement and to be automated.

You have the right to object to processing, automated decision-making and profiling

You have the right to object to the processing of personal data concerning you at any time according to your specific circumstances. This right does not concern public sector registers, which are kept by law.

You have the right not to accept decisions based solely on automated processing (such as profiling) that have legal implications for you or similarly significantly affect you.

You have the right to be notified of breaches of your personal data

We are required to communicate personal data breaches directly to the data subjects involved in the breaching data. This right comes into effect if the breach may pose a high risk to the rights and freedoms of the individual, for example in the form of identity theft, fraudulent transactions or other criminal activity.

contact us

For any inquiries and requests regarding the processing of personal data, You can send an email to: luke@pedolacycle.com