

PRIVACY NOTICE

FOR INDIVIDUALS IN THE DATA FILE OF GLOBAL GROUP TDA GERMANY GMBH (“GLOBAL GROUP”) PURSUANT TO ART. 13, 14 GDPR

This information provides you with an overview of how Global Group processes your personal data and your rights under data protection law. Please also share this information with current and future authorized representatives.

1. WHO IS RESPONSIBLE FOR DATA PROCESSING AND WHO CAN I CONTACT?

The controller, as defined in Article 4(7) of the General Data Protection Regulation (GDPR), for the processing of your personal consumer data or personal company data is Global Group, Serviceware-Kreisel 1, 65510 Idstein. The best way to contact us is by email at datenschutz@global-group.de. You can also reach our company data protection officer at this address and using these contact details.

2. WHAT SOURCES AND DATA DOES GLOBAL GROUP USE?

We process personal data that we lawfully obtain from public directories and commercial databases or that is provided to us by our contractual partners. These include, in particular, address and data brokers as well as our contractual partners.

2.1 CATEGORIES OF DATA PROCESSED

Our private consumer data includes general master data (in particular first name, last name, mailing address, contact information, and year of birth).

Company data includes general master data (in particular the company name, legal name, or business name, information on the industry or type of business activity, as well as addresses and contact information), operational and financial metrics (such as revenue, total assets, and number of employees), risk assessment indicators (such as information regarding active or discontinued business operations), and company-related personal data (name,

date of birth, address, and contact information of owners, shareholders, or persons in management positions).

3. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DOES GLOBAL GROUP PROCESS MY DATA?

Purposes of data processing

Global Group processes personal consumer data for the purposes of address trading, advertising, address verification (identification and fraud prevention), analysis, and the creation, enrichment, and maintenance of our clients' databases.

Global Group processes personal company data for the purposes of address trading, advertising, data enrichment, and market analysis ("marketing data").

Legal Basis for Data Processing

Global Group processes the consumer data and company data in its database in accordance with applicable data protection laws.

The legal basis is primarily the processing of data to safeguard our legitimate interests or the legitimate interests of third parties pursuant to Article 6(1)(f) of the GDPR, provided that the data subject's interests or fundamental rights and freedoms do not take precedence. The legitimate interests of the recipients of our data include, in particular, market and opinion research, the implementation of targeted advertising, the optimization of sales processes, analysis, identification, fraud prevention, as well as the enrichment and correction of data sets already held by our customers.

If you have given your consent to the processing of your personal data for specific purposes (such as marketing, sharing data with partners, or providing information), this consent may also serve as the legal basis for data processing under Article 6(1)(a) of the GDPR.

4. WHO RECEIVES MY DATA?

As part of our dialogue marketing business, we transfer personal data to our customers as part of marketing data services and for the purposes of identity verification and fraud prevention.

The recipients of our consumer and business data include, on the one hand, address brokers, advertisers, and direct mail service providers, and, on the other hand, companies with their own databases that wish to have their existing data cleaned, supplemented, or analyzed for sales-relevant characteristics, and that use our data for their own purposes—such as assessing purchase probabilities, verifying identities, preventing fraud, or for advertising purposes. The recipients of our data primarily include retail companies, financial service providers (which also include payment processing companies and providers of identity verification and fraud prevention services), insurance companies, mail-order companies, market and opinion research institutes, and IT service providers. Furthermore, personal data is made available only to those entities that require this information to fulfill our contractual and legal obligations or to provide our services. In addition to our own employees, this includes external service providers engaged by us. These include, in particular, service providers in the fields of IT, logistics,

telecommunications, auditing, consulting, and marketing, as well as sales partners. The latter include, among others, other companies belonging to The Data Agency Group.

5. IS DATA TRANSFERRED TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS?

If there is no adequacy decision by the European Commission pursuant to Article 45 of the GDPR for a third country, Global Group will transfer data to a third country only if there are appropriate safeguards ensuring a level of data protection comparable to that under European law. In such cases, Global Group requires that the recipient contractually commit to the standard data protection clauses prescribed by the European Commission pursuant to Article 46(2)(c) of the GDPR.

6. HOW LONG WILL MY DATA BE STORED?

Consumer and business data collected from individuals for direct marketing purposes is stored for as long as it is necessary to fulfill the purpose for which it was collected. Furthermore, as a member of the DDV Deutscher Dialogmarketingverband e.V., Frankfurt, Global Group follows its recommendations regarding the retention and deletion periods for personal data and generally deletes such data three months after the purpose of storage has ceased to apply, unless statutory retention requirements preclude this.

7. WHAT DATA PROTECTION RIGHTS DO I HAVE?

Every data subject has the right of access under Article 15 of the GDPR, the right to rectification under Article 16 of the GDPR, the right to erasure under Article 17 of the GDPR, the right to restriction of processing under Article 18 of the GDPR, the right to object under Article 21 of the GDPR, and the right to data portability under Article 20 of the GDPR. Furthermore, pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with a competent data protection supervisory authority.

You may revoke your consent to the processing of personal data at any time. Please note that the revocation applies only to future processing and does not affect data processing that took place prior to the revocation.

You can exercise your rights using the online forms on our website <https://www.global-group.de/de/datenschutz>. You can immediately request that your data be blocked for advertising purposes there. For the processing of requests regarding the exercise of other rights, you will receive a response to your inquiry within one month at the latest, in accordance with the statutory deadline.

8. AM I REQUIRED TO PROVIDE DATA?

You must provide us with the personal data necessary to fulfill your request or that we are legally required to collect. In particular, data protection regulations require us to verify your identity with sufficient

. Without sufficient and appropriate information, we will not be able to address your request.

Therefore, when submitting a request, please always include your first and last name as well as your full mailing address so that we can clearly identify you. This is necessary because your name may appear multiple times in Germany, or even just in a similar spelling.

If we are unable to clearly identify you—for example, if we receive a request from an address other than the one you provided or from abroad—we may ask you to provide a redacted copy of your ID. This is to ensure that we do not disclose any information to an unauthorized third party who is not you.

9. IS AUTOMATED DECISION-MAKING, INCLUDING PROFILING, USED?

Global Group uses data processing methods with the aim of evaluating certain personal aspects (“profiling” as defined in Article 4(4) of the GDPR). The results of these evaluations are used exclusively for marketing purposes, such as to provide you with targeted information and advice about our services, and to tailor our marketing communications—including market and opinion research—to your specific needs. The underlying calculation models comply with all legal requirements and are based on recognized mathematical and statistical methods. This profiling for the purpose of managing promotional communications has no legal effect on the data subjects and does not otherwise significantly affect them.

We do not use automated decision-making as defined in Article 22 of the GDPR.

10. USE OF reCAPTCHA

We use the reCAPTCHA service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) to enhance the security of our website and to protect against spam and abuse.

reCAPTCHA is used to determine whether data entry on our websites is performed by a human or through automated, machine-based processing. This involves transmitting your IP address and, if necessary, other data required by Google for the reCAPTCHA service to Google. The legal basis for the use of reCAPTCHA is Article 6(1)(f) of the GDPR. Our legitimate interest lies in protecting our website from abusive automated scanning and from spam.

For more information about Google's privacy policies, please visit: [Google Privacy Policy](#).

Global Group

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