

# PRIVACY NOTICE

## PURSUANT TO ARTICLES 13 AND 14 OF THE GDPR FOR CUSTOMERS, PROSPECTS, AND BUSINESS PARTNERS OF GLOBAL GROUP TDA GERMANY GMBH (“GLOBAL GROUP”)

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 responsible for processing your data—whether you are a customer, prospective customer, or business partner—within the meaning of Article 4(7) of the General Data Protection Regulation (GDPR) is Global Group, Serviceware-Kreisel 1, 65510 Idstein.

The best way to reach us is by email [atdatenschutz@global-group.de](mailto:atdatenschutz@global-group.de). You can also contact our company data protection officer at the address and contact details provided above.

### 2. WHAT SOURCES AND DATA DOES GLOBAL GROUP USE?

We process personal data that we receive from you, your customers, or prospective customers in the course of our business relationship. We also process personal data that we lawfully obtain from public directories and other generally accessible sources, or that is provided to us by contractual partners. These include, in particular, address and data brokers, as well as companies within The Data Agency Group.

In addition to personal details or master data (name, address, affiliated company, position, and contact information), the personal data relevant to the management of business relationships includes data from current and past orders, payment and billing data, usage data and logs, as well as marketing and sales data, and information comparable to the aforementioned categories.

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

Global Group processes the personal data of its customers, prospects, and business partners in accordance with applicable data protection laws:

#### **Data processing to fulfill legal obligations (Art. 6(1)(b) and (c) GDPR)**

We process your data to fulfill contractual obligations, including pre-contractual measures (such as preparing quotes), in accordance with Article 6(1)(b) of the GDPR as part of the marketing and information services we offer. The specific purposes of data processing depend on the particular product. Further details can be found in the relevant order documents and terms and conditions.

In addition, we process your data to fulfill legal obligations pursuant to Article 6(1)(c) of the GDPR, in particular to the extent that we are subject to tax-related audit and reporting obligations.

#### **Data processing to safeguard legitimate interests (Art. 6(1)(f) GDPR)**

Furthermore, we process data to safeguard our legitimate interests or the legitimate interests of third parties in accordance with Article 6(1)(f) of the GDPR, provided that the data subject's interests, fundamental rights, and freedoms do not override those interests. The grounds for our legitimate interests include, in particular, security measures to ensure the security of our operational facilities, buildings, and IT systems; the review and optimization of procedures for needs analysis for the purpose of direct customer outreach; measures for business management and the further development of services and products; as well as purposes related to advertising or market and opinion research.

#### **Data processing based on your consent (Art. 6(1)(a) GDPR)**

To the extent that you have given us consent to process your personal data for specific purposes (for example, for marketing purposes, the transfer of data to cooperation partners, or for information purposes), this consent also serves as the legal basis for data processing pursuant to Art. 6(1)(a) GDPR

### **4. WHO RECEIVES MY DATA?**

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

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

Your data will only be transferred to entities in countries outside the European Union ("third countries") if you have given us your consent, if the transfer is necessary to fulfill a specific order or is required by law, or if it is part of a data processing arrangement.

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?**

We store personal data for as long as necessary to process services. After that, it is deleted, unless its further storage—for a specific purpose—is necessary to fulfill commercial and tax law retention obligations (for example, under the German Commercial Code or the German Fiscal Code) or to preserve evidence within the scope of the statutory limitation periods pursuant to Sections 195 et seq. of the German Civil Code. The retention periods under commercial and tax law are up to ten years. The statute of limitations periods can run for up to 30 years, with the standard statute of limitations period being three years.

Consumer data collected 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 review and deletion periods for personal data and generally deletes such data 3 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.

## **8. AM I REQUIRED TO PROVIDE DATA?**

As part of our business relationship, you must provide the personal data necessary to fulfill the associated obligations or that we are legally required to collect. In particular, data protection regulations require us to verify your identity with sufficient certainty before disclosing any information. Without sufficient and appropriate information, we will not be able to enter into a contract with you or process your request.

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

Global Group uses data processing procedures to evaluate certain personal aspects (“profiling” as defined in Article 4(4) of the GDPR). This includes analytical tools that we use for marketing purposes to provide you with targeted information and advice about our services, as well as to tailor our marketing communications—including market and opinion research—to your specific needs. 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 in accordance with Article 22 of the GDPR.

**Global Group**

*May 2025*

