Privacy policy

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Vectron Systems AG, Willy-Brandt-Weg 41, 48155 Münster (**"Vectron"**, **"we"**, **"us"**, **"our"**), operates a cloud-based software-as-a-service solution (**"myVectron"**) under the name "myVectron", which offers the operator (**"operator"**, **"you"**, **"your/your/yours"**) various web- and app-based services within the scope of individual modules (**"myVectron modules"**) bookable by the operator. By booking the individual myVectron modules, the Operator receives access to the services offered via these (**"myVectron services"**).

The following data protection information explains which personal data we collect via the operator in connection with the use of myVectron services and how we process this data if the operator has concluded a corresponding contract on the booking and use of myVectron services (**"operator contract"**). The data protection information is divided into a general part, in which we provide the general explanations applicable to all data processing, and a special part, in which we describe the particularities of specific processing activities.

Content

1. GENERAL PART

1.1. Person responsible for data protection

The person responsible under data protection law for the collection and processing of the Operator's personal data when using the myVectron services is the

Vectron Systems AG
Willy-Brandt-Weg 41
48155 Münster
E-mail: datenschutz@vectron.de

Further information on Vectron Systems AG can be found at www.vectron.de.

1.2. Data Protection Officer ofthe Responsible

If you have any questions, concerns or suggestions regarding data protection in relation to myVectron services, you can contact our data protection officer at any time:

The data protection officer of the data controller is:

Mr Frank Dabelstein
Trigonum GmbH
Notkestraße 9
22607 Hamburg
Tel: +49 (0) 40 - 318816180
E-mail: eDSB@trigonum.de
Website: http://www.trigonum.de/

You can also assert your data subject rights with our data protection officer. You can find more information on this in section 1.7.

1.3. Processing of your personal data when registering and using myVectron services (processing purposes and legal basis)

1.3.1. Personal data of the operator

According to the EU General Data Protection Regulation (hereinafter "**GDPR**"), personal data means any information relating to an identified or identifiable natural person ("**data subject**"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more particular personal characteristics (hereinafter "**personal data**"). **Data that can only be assigned to a legal entity does not constitute personal data and is therefore not subject to the provisions of this data protection notice or the GDPR.**

Personal data from you in connection with the use of the myVectron services are

- Partner, company name, title, first and last name and e-mail address of the contact person of the operator, address, telephone number, website, payment information, VAT ID, branch number, branch name, operating mode per branch, branch addresses, branch telephone numbers, branch websites, branch e-mail addresses, branch tariffs and selected modules, billing details, i.e. e.g. billing total and billing date, termination date, opening hours, customer number, terminal IDs of card terminals used incl. usage period ("master data operator").i.e. e.g. billing amount and billing date, termination date, opening hours, customer number, terminal IDs of card terminals used incl. period of use (**"master data operator"**),

- Login data of the operator for the myVectron portal; i.e. login and hash value of the password (**"Login data operator"**)

- Cash register login, software serial numbers of the cash register, cash register password, cash register number, cash register name (**"Cash register login data"**)

- Consents of the operator (**"Consents operator"**)

- Master data of the operator's employees; i.e. ID of the employee, employee name (**"Master data employees"**),

- Article master data (insofar as these have a personal reference); i.e. product groups, article properties (e.g. article number, article name, price, VAT rate) (**"Article master data"**),

- Usage data of the operator (insofar as these have a personal reference); i.e. any business processes/incidents such as e.g. invoices, down payments, delivery notes, deposits and withdrawals, articles on the respective receipt and insofar as corresponding modules are booked by the operator: orders placed, reservations made, discounts awarded, stamps and other forms of bonuses as well as vouchers created, linked accounts/ID to external service providers (**"usage data operator"**),

- Cash register data of the operator (insofar as these have a personal reference); i.e. transaction-related data collected in the cash register, this includes in particular operator ID (incl. login and logout), invoice number, invoice date and time, invoice currency, invoice items, product groups, item price, discounts, price mark-ups, payment method and internal payment ID, currency, payment amount as well as further technical information on the transaction process (**"cash register transaction data operator"**),

- Support data of the operator; i.e. the data and error messages arising within the scope of customer support, the administration of the operator's data and the fulfilment of the data subject rights (e.g. when processing your requests for information, correction and deletion), maintenance interval per branch, fiscal status of the cash registers, (**"support data operator"**),

- Technical analysis data; i.e. your (pseudonymous) technical communication data (e.g. IP addresses, browser and app settings) required to use myVectron services and your (pseudonymous) myVectron usage data (e.g. IP, cookie or device ID-based website and app usage data) collected by us to analyse and improve myVectron (**"Technical Analysis Data"**) For more information on cookies and tracking and analysis data, please visit www.myvectron.com/de/datenschutz.

1.3.2. No personal data: aggregated data

So-called anonymised data, which no longer permit any - even indirect - inference to identifiable natural persons, are not personal data. Such anonymisation is ensured, for example, by data

aggregation, i.e. the combination of data of several data subjects into group data records which no longer contain any statement on an individual data subject ("**aggregated data**"). Aggregated data are not subject to the restrictions of data protection and can in this respect be used and processed "freely" without further preconditions and we reserve the right to anonymise or data aggregation in relation to all data collected and processed in the context of the use of the myVectron services. We use such anonymised or aggregated data obtained from the use of the myVectron services, among other things, for the optimisation of the myVectron services and their functions, for reporting and benchmarking as well as for general market research and, if necessary, transmit them to third parties (for more details, please refer to section 2.4).

1.3.3.   Data processing for the use of myVectron services and registration

In order for us to be able to offer and process the use of myVectron services by the operator as described in our General Terms and Conditions of Vectron Systems AG for the use of myVectron and for the operator to be able to use them, we require as well as collect and process at least the login data operator, the master data operator and technical communication data within the scope of the technical analysis data (as described in section 1.3.1). Details of the data processing in relation to the individual myVectron modules can be found in the special section of this data protection notice.

1.3.4.   Customer support, customer data management, processing for data subject rights

We collect and process the operator support data (as described in section 1.3.1) exclusively within the framework of the administration of the customer relationship with the operator, in particular for the purposes of customer support, the administration of the operator's customer data and the fulfilment of the operator's data subject rights (e.g. to process requests for information, correction and deletion under data protection law) (for the operator's data subject rights, see section 1.7).

The legal basis for this data processing is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the fulfilment of the operator contract concluded between the operator and us.

1.3.5.   Data processing for the analysis and improvement of myVectron and myVectron services

We collect and process technical analysis data, i.e. (pseudonymous) data on the use of myVectron services and myVectron in general (as described in section 1.3.1), for the purpose of analysing and improving the use or usability of myVectron and myVectron services.

The legal basis for this data processing is Art. 6 para. 1 lit. f) DSGVO, which permits the processing of personal data within the scope of our "legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator do not prevail. Our legitimate interests consist in the measurement, analysis and improvement of our own offers. **The operator has the right to object to this data processing if the legal requirements pursuant to Art. 21 (1) DSGVO are met. The operator can exercise this right of objection by sending a corresponding objection to datenschutz@vectron. de.**

1.3.6.   Data processing for advertising purposes

We also use the master data operators for advertising.

The legal basis for this data processing is Art. 6 para. 1 lit. a) DSGVO (data protection consent for specific purposes), Art. 6 para. 1 lit. b) DSGVO (implementation of pre-contractual measures that take place at the request of the operator) and - with regard to postal advertising - Art. 6 para. 1 lit. f) DSGVO, which permits the processing of personal data within the framework of our "legitimate interests", insofar as the fundamental rights, fundamental freedoms or interests of

the operator do not prevail. Our legitimate interests consist of addressing the operator for our own promotional purposes. **The operator shall have the right to object to the processing of data based on Vectron's legitimate interests in accordance with Article 21 (1) of the Data Protection Act if the legal requirements are met. The operator may exercise this right of objection by sending a corresponding objection to datenschutz@vectron. de. The operator may also revoke his consent to the use of data for advertising purposes at any time. The operator can exercise this revocation by sending a message to datenschutz@vectron. de.**

More detailed explanations on this and on these data processing operations can be found in the special section of this data protection information in section 2.2.

1.3.7.   Data processing for internal research, analysis and market research purposes

We use the master data operator, master data article, usage data operator and checkout transaction data operator for internal research, analysis and market research purposes. The legal basis for this data processing is Art. 6 para. 1 lit. f) DSGVO, which permits the processing of personal data within the framework of our "legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator do not prevail. Our legitimate interests consist in the analysis and elicitation of marketing opportunities for the data as well as for the analysis of error messages and the elimination of malfunctions and potential sources of error. This data will not be passed on to third parties in this context. **The operator shall have the right to object to the processing of data based on Vectron's legitimate interests pursuant to Art. 21 (1) of the German Data Protection Act (DSGVO), if the legal requirements are met. The operator may exercise this right of objection by sending a corresponding objection to datenschutz@vectron. de.**

1.4.   Disclosure of your data (recipients of personal data)

We only pass on the operator's personal data to others (recipients)

- insofar as this is necessary or useful for the provision, performance, processing and use of the myVectron services,

- insofar as consent has been granted to us by the operator for this purpose and has not been revoked,

- insofar as this is necessary to protect our legitimate interests and insofar as the interests or fundamental rights and freedoms of the operator do not prevail,

- to the extent that we engage service providers to operate myVectron or to provide or process myVectron services, who process personal data on our behalf and in accordance with our instructions,

- insofar as this is required by mandatory legal provisions, e.g. vis-à-vis government agencies, or

- in accordance with Clause 1.4.3.

As far as necessary, we pass on personal data of the operator in particular to the following recipients or categories of recipients:

1.4.1. Transfer of personal data to service providers

If necessary, we transmit personal data of the operator to service providers, as far as this is necessary or useful for the provision, processing and use of myVectron as well as the myVectron services and/or other services owed by Vectron to the operator.

The legal basis for these data transfers is Art. 6 para. 1 lit. b) DSGVO and these serve to fulfil the operator contract or to carry out pre-contractual measures at the request of the operator.

1.4.2. Involvement of processors

In the operation of myVectron and the provision and processing of myVectron services, we sometimes use external technical and other service providers who support us in the provision of our services. To the extent necessary, these service providers engaged by us process the personal data of the operator within the scope of their respective mandate in accordance with our instructions for the purposes stated in this data protection information. They are contractually obliged to strictly comply with this data protection notice, the applicable statutory data protection provisions and our instructions (so-called order processors pursuant to Art. 28 DSGVO). The same applies to any subcontractors, insofar as our processors use such with our prior consent.

We use order processors in particular for the hosting of myVectron.

1.4.3. Disclosure of personal data to distribution partners

If necessary, we transmit personal data of the operator to sales partners, provided that the contractual relationship with the operator has come about solely due to the media-tion activity of a sales partner and there is an overriding interest in the transmission of the personal data to the sales partner.

The legal basis for this data transfer is Art. 6 (1) lit. F) DSGVO, which regulates data processing for the protection of legitimate interests.

1.4.4. Disclosure of personal data to industry partners

In addition, we transfer some personal data listed in section 1.3.1 to our partner companies ("industry partners"), provided that the operator has consented to such transfer accordingly. A current list of industry partners who receive personal data can be found at www.myvectron.com/de/industriepartner.

In the context of the cooperation with Industry Partners, the following personal data as defined in Clause 1.3.1will be transferred to the Industry Partners ("**Industry Partner Data Set**"):

Master data operator,

- Master data item,

- Usage data Operator and

- Cash transaction data Operator.

1.4.3.1. The industry partner record is transmitted to the industry partners exclusively for the following purposes:

- to provide services to the operator (if the operator procures services from the respective industry partner),

- for analysis and market research purposes, in particular with regard to potential and market analyses and/or

- Implementation of sales promotion measures, in particular advertising of goods and services of the industrial partner towards the operator by the industrial partner itself or also by Vectron.

1.4.3.2. The legal basis for the data transfer of the industry partner records to the industry partners is the consent of the operator in accordance with Art. 6 para. 1 lit. a) DSGVO (data protection consent for specific purposes)**.**

The consent granted accordingly can be revoked at any time in accordance with Art. 7 (3) DSGVO vis-à-vis Vectron Systems AG, Willy-Brandt-Weg 41, 48155 Münster, e-mail datenschutz@vectron. de as the responsible party with effect for the future. A revocation does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

In case of revocation Vectron will stop the transmission of the data concerned to the industry partners. However, this may affect the contractual relationship between Vectron and the operator (in particular with regard to discounting or payment for myVectron services, see GeneralTerms and Conditions of Vectron Systems AG for the use ofmyVectron).

1.4.5. Sharing of data in the context of the provision of third party support services

If the operator is attended to by a third party service provider, e.g. a Vectron trade partner, regarding installation and/or support of the POS system, the operator may instruct Vectron to release or transmit certain data to the service provider, so that the latter can smoothly render the services to be rendered by him to the operator. The scope of the data transfer results directly from the corresponding instruction.

The legal basis for this data processing is Art. 6 para. 1 lit. a) DSGVO (data protection consent for specific purposes). **The operator may revoke his consent to the transfer of data to the service provider at any time and instruct Vectron to no longer transfer the data. The operator can exercise this revocation by sending a message to datenschutz@vectron. de.**

1.4.6. Disclosure of personal data to other recipients

Any further transfer of personal data of the operator to other recipients does not take place.

1.5. Processing of personal data in "third countries

The personal data we collect is processed exclusively within the EU. Personal data is not transferred to so-called "third countries", i.e. countries outside the EU and the EEA.

1.6. Duration of storage

In general, we only store personal data as long as this is necessary to fulfil the purpose of the respective data processing or the operator requests us to delete the personal data for other legitimate reasons (see Art. 17 (1) DSGVO). After expiry of these storage periods or in response to a justified deletion request by the operator, we check in each case whether certain personal data are still required for (other) legitimate purposes and, if not, whether contractual or statutory retention periods prevent the deletion of the personal data. In such cases, the personal data concerned will continue to be stored for as long as necessary to fulfil this (other) legitimate

purpose or for the duration of the respective contractual or legal retention period for these purposes. However, they will be blocked for other purposes and then finally deleted after the expiry of the respective last contractual or legal retention period.

We store the data collected by us in accordance with this data protection information for the purpose of fulfilling and processing the operator contract, in principle, at the longest until the end of the third calendar year following the date of termination of the contract. Thereafter, this personal data is usually deleted immediately, otherwise after expiry of the applicable retention periods under commercial and tax law of six or ten years.

If the operator has given us a declaration of consent to process his personal data for advertising purposes, we will store the personal data required for these purposes until the declaration of consent has been revoked, at the latest until the point in time described in the previous paragraph.

We only store the technical analysis data on or from the use of myVectron services and myVectron for a maximum of six months for the purposes of using, measuring, analysing and improving our offers.

1.7. Rights of the operator (data subject rights)

Insofar as the legal requirements pursuant to Art. 15 et seq. DSGVO, the operator has the following rights with regard to his personal data stored by us (so-called data subject rights):

- The operator can request information from us at any time as to whether personal data and which categories of personal data about him are stored by us, for which purposes they are processed and which recipients or categories of recipients receive them, if any. Furthermore, the operator can ask us for the other information listed in Art. 15 DSGVO regarding his personal data (right to information).

- In accordance with the legal requirements, the operator also has a right to rectification (Art. 16 DSGVO), a right to deletion (Art. 17 DSGVO) and a right to restriction of processing (blocking) (Art. 18 DSGVO) of his personaldata.

- Pursuant to Art. 20 DSGVO, the operator also has the right to receive from us the personal data concerning him/her that has been provided by him/her in a structured, common and machine-readable format; the operator may also transfer these personal data or have them transferred to other responsible parties (right to data portability).

- The operator is also entitled to revoke his consent at any time (see also section 1.4.3.2).

- **In addition, the operator has the right to object to data processing based on the legitimate interests of the controller or a third party pursuant to Art. 6 (1) (f) DSGVO, if the legal requirements pursuant to Art. 21 DSGVO are met (see also sections 1.3.5and 1.3.6).**

The operator can contact us at any time at datenschutz@vectron. de to assert his or her rights as a data subject.

Furthermore, the operator has the right to complain to a data protection supervisory authority if he/she believes that the processing of personal data concerning him/her violates data protection law.

1.8. Data security

We use extensive technical and organisational precautions to protect the personal data stored and processed by the operator with us against misuse, accidental or intentional manipulation, loss, access by unauthorised persons and against other data security risks. Our data security precautions are continuously improved in line with technological developments. The transmission of personal data is encrypted according to the current state of the art.

Our employees are obliged by us to maintain confidentiality and to comply with the relevant data protection regulations.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is therefore not possible.

1.9. Amendment of the data protection notice

We may amend this privacy policy at any time to reflect changes in factual or legal circumstances and will always publish the latest version of this privacy policy at www.myvectron.com/de/datenschutz. The last time this privacy notice was changed can be seen from the date ("Last updated") at the beginning of this privacy notice.

2. SPECIAL PART

2.1. Creditworthiness check

2.1.1. We transmit personal data collected in connection with the establishment of the contractual relationship with the operator about the application, the implementation and the termination of this business relationship (in particular the relevant master data of the operator) as well as data about non-contractual behaviour or fraudulent behaviour to SCHUFA Holding AG, Creditreform Münster Riegel & Riegel KG, Creditreform Boniversum GmbH or CRIF Bürgel GmbH. The legal basis for these transfers is Art. 6 (1) (b) and Art. 6 (1) (f) DSGVO. Transmissions on the basis of Art. 6 (1) (f) DSGVO may only be made insofar as this is necessary to protect the legitimate interests of the contractual partner or third parties and does not override the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. **The operator has the right to object to such data processing if the legal requirements pursuant to Art. 21 (1) DSGVO are met. The operator can exercise this right of objection by sending a corresponding objection to datenschutz@vectron.de.**

2.1.2. SCHUFA processes the data received and also uses it for the purpose of profiling (scoring) in order to provide its contractual partners in the European Economic Area and in Switzerland and, if applicable, other third countries (insofar as an adequacy decision by the European Commission exists in respect of these) with information on, among other things, the assessment of the creditworthiness of natural persons. Further information on SCHUFA's activities can be found in the SCHUFA information sheet pursuant to Art. 14 of the Data Protection Regulation or online at https://www.schufa.de/.

2.1.3 In the event of non-payment by the operator, we will forward the data required for debt collection (master data of the operator and the corresponding data of the open invoice) to our legal service provider KSP (Kanzlei Dr. Seegers, Dr. Frankenheim Rechtsanwaltsgesellschaft mbH) for the purpose of debt collection. The legal basis for this transfer is Article 6 (1) (b) or Article 6 (1) (f) DSGVO. Transfers on the basis of Article 6 (1) (f) DSGVO may only take place insofar as this is necessary to protect the legitimate interests of the contractual partner or third parties and does not override the interests or fundamental rights and freedoms of the data subject which

require the protection of personal data. **The operator has the right to object to such data processing if the legal requirements pursuant to Art. 21 (1) DSGVO are met. The operator can exercise this right of objection by sending a corresponding objection to datenschutz@vectron. de.**

2.2.   Provision of individual myVectron services

Furthermore, we collect and process personal data in order to fulfil our services from the contractual relationship with the operator. Which personal data this is in individual cases depends on the myVectron modules booked by the operator. The following is an overview of the personal data processed by Vectron within the scope of the respective myVectron modules:

2.2.1.   myVectron Reporting

With regard to myVectron reporting within the framework of the myVectron reporting app and/or myVectron web reporting, the master data for employees, master data for articles, usage data for operators and the cash register transaction data for operators are collected and processed when this myVectron module is used.

The legal basis for the data processing listed in this section 2.2.1is Art. 6 para. 1 lit. b) DSGVO. The data processing is required either to fulfil the operator contract on the use of myVectron services or to carry out pre-contractual measures that are carried out at the request of the operator.

2.2.2.   myVectron Fiscal Archive DE /AT

With regard to the myVectron Fiscal Archive DE as well as the Fiscal Archive AT, the master data operator, login data operator, master data employee, master data article, usage data operator, cash transaction data operator and the technical analysis data are collected and processed when using this myVectron module.

The legal basis for the data processing listed in this section 2.2.2is Art. 6 para. 1 lit. b) DSGVO. The data processing is required either to fulfil the operator contract on the use of myVectron services or to carry out pre-contractual measures that take place at the request of the operator.

2.2.3.   myVectron DeutschlandCard

2.2.3.1.   For the data processing operations referred to in this Clause 2.2.31.3.1addition to the definitions set out in Clause 1.3.1the following definitions regarding personal data and categories of data shall apply:

- Data of the operator's participating points of sale in connection with myVectron DeutschlandCard (insofar as these have a personal reference); i.e. ID assigned by DeutschlandCard GmbH to the operator's points of sale participating within the framework of myVectron DeutschlandCard ("**branch ID**") and their contact data, such as in particular branch name, address data and opening hours ("**DeutschlandCard master data operator**"),

- POS transaction data in connection with myVectron DeutschlandCard (if these have a personal reference); i.e. transaction-related data collected in connection with the collection or redemption of DeutschlandCard points in the cash register, this includes in particular the partner ID of the operator assigned by Vectron, transaction number, branch ID, transaction number, transaction number (receipt ID), invoice time and date, card number of the DeutschlandCard card of the DeutschlandCard participant, invoice value (total voucher), gross turnover of the

transaction, insofar as DeutschlandCard points were awarded by the operator, number of DeutschlandCard points redeemed with the transaction as well as ID of coupons used by the DeutschlandCard participant in the context of collecting DeutschlandCard points in the transaction ("**DeutschlandCard POS transaction data**"), and

- Order data of the operator in connection with the POS starter packages; i.e. company name, title, first and last name, address of the recipient ("**DeutschlandCard POS starter package data**").

2.2.3.2. With regard to myVectron DeutschlandCard, the following personal data of the operator are collected and processed by Vectron:

- the master data employee, master data article, the usage data operator and the cash transaction data operator as well as

- the DeutschlandCard Master Data Operator, DeutschlandCard Cash Transaction Data and the DeutschlandCard POS Starter Package Data.

2.2.3.3. The following personal data of the operator shall be transmitted by Vectron to DeutschlandCard GmbH:

- the DeutschlandCard Master Data Operator, DeutschlandCard Cash Transaction Data and the DeutschlandCard POS Starter Package Data.

2.2.3.4. The processing, collection and transmission of the data listed in Sections 2.2.3.2and 2.2.3.3with the exception of the DeutschlandCard Master Data Operator and the DeutschlandCard POS Starter Package Data) is carried out for the purpose of (i) accounting for and settling the DeutschlandCard Points with regard to both the Operator and the Participant of the DeutschlandCard Programme and (ii) preventing incorrect bookings and/or cases of abuse.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary either for the performance of the operating agreement on the use of the services of the myVectron DeutschlandCard module or for the performance of the agreement between the participant in the DeutschlandCard programme and DeutschlandCard GmbH on participation in the DeutschlandCard programme. The legal basis for this data processing is also Art. 6 (1) f) DSGVO, which permits the processing of personal data in the context of our "legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator to protect its personal data do not prevail. Our legitimate interests are the proper accounting and settlement of DeutschlandCard points and to prevent incorrect bookings and/or misuse by the operator and/or the participant of the DeutschlandCard programme.

2.2.3.5. The processing, collection and transmission of the DeutschlandCard Master Data Operator referred to in Sections 2.2.3.2and 2.2.3.3shall be carried out for the purpose of integrating and publishing the Operator's participating points of sale in the so-called "Branch Finder" on the DeutschlandCard website and the mobile application of DeutschlandCard GmbH so that DeutschlandCard Participants can locate the relevant points of sale.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the fulfilment of the operator contract with regard to the myVectron DeutschlandCard module. The legal basis for this data processing is also Art. 6 (1) (f) DSGVO, which permits the processing of personal data within the scope of our

"legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator to protect its personal data do not prevail. Our legitimate interests or the legitimate interests of DeutschlandCard GmbH and of the participants in the DeutschlandCard programme are that all points of acceptance for the collection and redemption of DeutschlandCard points can be found by the participants in the DeutschlandCard programme.

2.2.3.6. The processing, collection and transmission of the DeutschlandCard POS Starter Pack data referred to in Sections 2.2.3.2and 2.2.3.3shall be carried out for the purpose of enabling the Operator to reorder so-called POS Starter Packs produced by DeutschlandCard GmbH from Vectron, which shall be sent directly to the Operator by DeutschlandCard GmbH.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the operator to order the POS starter packages.

2.2.4. myVectron table reservation

2.2.4.1. For the data processing operations referred to in this Clause 2.2.4, in addition to the definitions set out in Clause 1.3.1the following definitions regarding personal data and categories of data shall apply:

- Data of the reservations; i.e. date, time, number of persons, first and last name as well as e-mail address and telephone number of the person making the reservation and (if this option is used) in addition the optional message of the person making the reservation to the operator ("**reservation data**").

2.2.4.2. With regard to myVectron table reservation, the reservation data, the master data operator and the cash register transaction data operator are collected and processed when using this myVectron module.

2.2.4.3. The following personal data of the operator will be transmitted by Vectron to resmio GmbH: Master data operator.

2.2.4.4. The processing, collection and transmission of the data listed in sections 2.2.4.2 and 2.2.4.3 is carried out for the purpose of being able to allocate the reservation to the operator, to book it and to communicate it to him.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services.

2.2.4.5. The processing, collection and transmission of the data listed in section 2.2.4.3 is also carried out for the purpose of creating a user account on the platform operated by resmio GmbH for the operator and to enable the operator to register for this account.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services. For this purpose,

Vectron uses a service provider who is obliged to comply with data protection requirements pursuant to clause 1.4.2.

2.2.4.6. The reservation data according to clause 2.2.4.1 are collected by resmio on behalf of Vectron and transmitted to Vectron.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services.

2.2.4.7. Vectron has no influence on and is not responsible for the processing of personal data by resmio GmbH, which are transmitted according to clause 2.2.4.3. Vectron is neither aware of the data processing nor of all its purposes and storage periods comprehensively and/or in detail. The resmio GmbH has its own data protection and terms of use, which the operator has taken note of or agreed to when using the platform. Which personal data resmio collects and processes for which purposes, to which extent, on the basis of which legal grounds, as well as the rights and setting options for the protection of privacy, can be found again in the privacy policy of resmio at https://www.resmio.com/ .

2.2.5. myVectron online order

2.2.5.1. For the data processing operations referred to in this Clause 2.2.5, in addition to the definitions set out in Clause 1.3.1the following definitions regarding personal data and categories of data shall apply:

- Data of the online order; i.e. date, time, ordered good(s) or service(s), first and last name as well as e-mail address and telephone number of the person placing the order and (if this option is used) furthermore the optional message of the reserving person to the operator and furthermore, in case of a delivery request, the delivery address and the requested delivery time as well as the actual delivery time ("**Order Data**").

2.2.5.2. With regard to myVectron Online Ordering, when using this myVectron module, the order data, the master data operator and the checkout transaction data operator are collected and processed.

2.2.5.3. The following personal data of the operator are transmitted by Vectron to rbNext Systems GmbH: the master data operator and the order data confirmed by the operator.

2.2.5.4. The processing, collection and transmission of the data listed in sections 2.2.5.2 and 2.2.5.3 is carried out for the purpose of being able to assign the online order to the operator, to book it and to communicate it to him for processing.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services.

2.2.5.5. The processing, collection and transmission of the data listed in section 2.2.5.3 is also carried out for the purpose of mediating a contractual relationship between rbNext Systems GmbH and the operator at the operator's request and to create a user account on the platform operated by rbNext Systems GmbH for the operator and to enable the operator to register for this.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services. rbNext Systems

GmbH has been obliged to comply with data protection requirements in accordance with section 1.4.2.

2.2.5.6. The order data according to section 2.2.5.1 are collected by rbNext GmbH and transmitted to Vectron.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services.

2.2.5.7. Vectron has no influence on and is not responsible for the processing of personal data by rbNext Systems GmbH, which are transmitted according to section 2.2.5.3. Vectron is neither aware of the data processing nor of all its purposes and storage periods comprehensively and/or in detail. Rather, rbNext Systems GmbH has its own data protection and terms of use, which the operator has taken note of or agreed to in the context of the use of the platform. Which personal data rbNext Systems GmbH collects and processes for which purposes, to which extent, on the basis of which legal grounds, as well as the rights and setting options for the protection of privacy, are explained to the operator again in the data protection declaration of rbNext Systems GmbH at https://www.restablo.de.

2.2.6. myVectron Payment

2.2.6.1. With regard to myVectron Payment, the master data operator, the usage data operator as well as the checkout transaction data operator and the technical analysis data are collected and processed when using this myVectron module.

2.2.6.2. The following personal data of the operator shall be transmitted by Vectron to EVO Payments International GmbH as well as transact Elektronische Zahlungssysteme GmbH: the master data operator and the POS transaction data operator.

2.2.6.3. The processing, collection and transmission of the data listed in sections 2.2.6.1 and 2.2.6.2 is carried out for the purpose of assigning the payment to the operator, accounting for it and settling it.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services.

2.2.6.4. The processing, collection and transmission of the data specified in Section 2.2.6.2 shall furthermore be carried out for the purpose of mediating a contractual relationship between EVO and the Operator at the latter's request and, with regard to EVO and transact, for the purpose of enabling the Operator to offer credit and giro card payments to its customers.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services. For the provision of payment options Vectron uses service providers who are obliged to comply with data protection regulations according to section 1.4.2.

2.2.6.5. Vectron has no influence on and is not responsible for the processing of personal data by EVO and transact, which are transmitted according to section 2.2.6.3. Vectron is neither aware of the data processing nor of all its purposes and storage periods comprehensively and/or in detail. EVO and transact have their own data protection and terms of use, which the operator has taken note of or agreed to in the context of his contract with EVO and transact. Which personal data EVO and transact collect and process for which purposes, to what extent, on the basis of which legal grounds,

as well as the rights and setting options for the protection of privacy, are explained to the Operator again in the data protection declaration of EVO at https://www.evopayments.eu/ and in the data protection declaration of transact at https://www.epay.de/.

2.2.7. myVectron vouchers

With regard to myVectron vouchers, the master data operator, master data article, usage data operator and the checkout transaction data operator are collected and processed when using this myVectron module.

The legal basis for the data processing listed in this section 2.2.7 is Art. 6 para. 1 lit. b) DSGVO. The data processing is required either to fulfil the operator contract on the use of myVectron services or to carry out pre-contractual measures that take place at the request of the operator.

2.2.8. myVectron Digital Receipt

With regard to the myVectron Digital Receipt, the master data employee, master data article, usage data operator and transaction data operator are stored and processed when using this myVectron module.

The legal basis for this data processing listed in this section 2.2.8 is Art.6 I lit. b) DSGVO. The data processing and storage is necessary for the fulfilment of the operator contract on the use of the myVectron services by Vectron.

2.2.9. myVectron connection DATEV cash archive online

2.2.9.1 With regard to the myVectron connection DATEV Kassenarchiv online, master data operator and cash register transaction data operator are collected and processed when using this myVectron module.

2.2.9.2 The following personal data of the operator are transmitted by Vectron to DATEV eG: Master data operator and POS transaction data operator.

2.2.9.3 The collection, processing and transmission of the personal data listed in Sections 2.2.9.1 and 2.2.9.2 is carried out for the purpose of allocating and booking the transmitted data to the operator at DATEV eG.

The legal basis for this is Art. 6 para. 1 lit. b) DSGVO. The data processing is necessary for the provision of the contractually agreed services

2.2.9.4 Vectron has no influence on and is not responsible for the processing of personal data by DATEV eG, which are transmitted according to clause 2.2.9.3. Vectron is neither aware of the data processing nor of all its purposes and storage periods comprehensively and/or in detail. Rather, DATEV eG has its own data protection and terms of use, which the operator has taken note of or agreed to in the context of using the platform. The operator can find out which personal data DATEV collects and processes for which purposes, to what extent and on the basis of which legal grounds, as well as the rights and setting options for protecting privacy, in DATEV's data protection declaration on the website www.datev.de.

2.3   myVectron Newsletter

If the operator has agreed to receive promotional e-mails, we will send a confirmation e-mail to the specified e-mail address after the newsletter consent has been granted, -with a request to

click on the link contained therein to confirm the registration and newsletter consent (double opt-in procedure).

Furthermore, we reserve the right to send promotional emails to the operator without the operator's consent, provided that the requirements of Section 7 (3) UWG are met. The legal basis for this data processing is Art. 6 para. 1 lit. f) DSGVO, which permits the processing of personal data within the scope of our "legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator do not prevail. Our legitimate interests consist of addressing the operator for our own promotional purposes.

If the myVectron newsletter concerns goods and/or services of bonVito GmbH, a subsidiary of Vectron, Vectron shall process the -email address provided by the operator as -well as the first and last name of the respective contact person named by the operator for -personal addressing in the myVectron newsletter. The legal basis for this data processing is the (competition law) e-mail newsletter consent of the operator according to § 7 para. 2 no. 3 Law against Unfair Competition and Art. 6 para. 1 lit. b) DSGVO (fulfilment of the contract on the use of myVectron services).

The operator can revoke his consent to receive the newsletter at any time or object to the processing of his personal data for newsletter purposes at any time by unsubscribing from the newsletter via the link contained in each newsletter or by the operator sending us a corresponding revocation or objection to [datenschutz@vectron. de](mailto:datenschutz@vectron.de).

2.4 Use of aggregated data for analysis, optimisation and market research

We anonymise the data collected by the operator within the scope of the use of the myVectron services (as described in section 1.3.2) by converting them into purely statistical, so-called aggregated data through data aggregation, i.e. by combining data from several data subjects into group data records. These aggregated data no longer allow any, even indirect, inference to the operator and are therefore no longer personal data. They are therefore not subject to the restrictions of data protection and can be used "freely" without further requirements.

We use this aggregated data obtained from the use of myVectron services by the operator in order to, through appropriate measurements, analyses and evaluations

- to design, improve and optimise the myVectron services and their components, functions and offers in a more demand-oriented manner,

- provide operators with reports on their statistical sales figures and other relevant statistical key figures and offer operators recommendations and other advisory services on this basis; and

- to conduct general market research and to be able to offer corresponding market research results to third parties.

The legal basis for the anonymisation of the operator's usage data is Art. 6 (1) f) DSGVO, which permits the processing of personal data within the framework of our "legitimate interests", insofar as the fundamental rights, freedoms or interests of the operator do not prevail. Our legitimate interests consist in the anonymised measurement, analysis, evaluation and improvement of our own offers and in their further economicexploitation. **The operator has a right to object to this data anonymisation if the legal requirements pursuant to Article 21 (1) of the Data Protection Regulation are met, insofar as and to the extent that the data on which the aggregation is based is personal data of the operator. The operator can exercise this right by sending us a corresponding objection to datenschutz@vectron.de.**