Data Privacy Statement

For interested parties and customers (USA and Canada)

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Data Privacy Statement for interested parties and customers

Data Privacy Statement for interested parties and customers

PTV Planung Transport Verkehr GmbH and its subsidiaries rely on internet-based business models and on the development of an internet-based range of our applications and solutions.

This Data Privacy Statement describes how we collect and record, use, disclose, transfer and store (*"process"*) the personal data of our customers (our contractual partners or interested parties, i. e. contract negotiation partners and their employees who use our products / hereinafter *"you"*). The personal data collected depends on the context of your interactions with us. We always treat your personal data confidentially and in accordance with the statutory data protection regulations and this Data Privacy Statement.

For the processing of personal data in connection with electronic communication (by e-mail, fax, telephone, etc.), the

- Data Privacy Statement Communication
  https://www.ptvgroup.com/en/data_privacy_statement_communication_en.pdf

The following data protection declarations apply to the processing of personal data in our products and services:

- Data Privacy Statement PTV-Cloud-Services
  https://legaldocs.ptvgroup.tech/en/data_privacy_statement_cloud_services_mobility__en_.pdf
- Data Privacy Statement PTV Vision
  https://www.ptvgroup.com/en/data_privacy_statement_ptv_vision_en.pdf
- Data Privacy Statement Econolite Products
  https://www.ptvgroup.com/en/data_privacy_statement_econolite_products.pdf

The general processing of personal data on our website is governed by the

- Data Privacy Statement Websites
  https://www.ptvgroup.com/en/data_privacy_statement_websites_en

1 Information about us and our data protection officer

1.1 Controller

Controller within the meaning of data protection law for the collection and use of personal data is

PTV Planung Transport Verkehr GmbH
Haid-und-Neu-Str. 15
76131 Karlsruhe

E-Mail: info@ptvgroup.com

PTV Planung Transport Verkehr GmbH (hereinafter referred to as *"PTV"* or *"PTV GmbH"*) together with the affiliated companies within the meaning of §§ 15 AktG (German Aktiengesetz) forms the "*PTV Group*". We may share contact information of customers and interested parties with affiliated companies of the PTV Group as part of your business relationship (contractual or pre-contractual relationship pursuant to Art. 6 (1) (b) General Data Protection Regulation (EU 2016/679 - GDPR)). We and the affiliated companies are jointly responsible for the protection of your personal data (Art. 26 GDPR). In order to ensure that you can easily and reliably exercise your data protection rights within the framework of this joint responsibility, we have agreed with our affiliated companies that you can assert your data subject rights not only against the respective company of the PTV Group, but also centrally against PTV Planung Transport Verkehr GmbH.

1.2 Data protection officer of the controller

You can contact our data protection officer directly via the e-mail address data-protection@ptvgroup.com.

2 General data processing

2.1 Type of data

2.1.1 Data processing regarding interested parties and potential new customers for the purpose of establishing contact, advertising and submitting offers

We collect and process personal data from interested parties and potential new customers for the purpose of establishing contact, communication and to present and offer them our products and services.

Data collection and data processing generally takes place through a conversation, the receipt of a business card, by requesting data from the interested party or potential new customer in order to prepare an offer, by the interested party or potential new customer proactively contacting us by email, telephone or other means of communication or communication channels and/or by the interested party or potential new customer filling out an order form or a contact form or web form.

2.1.2 Data processing regarding existing customers for the purpose of contract fulfillment and customer retention

We collect and process our customers' personal data for the purpose of fulfilling our contractual obligations, in order to offer customers further, similar services in addition to those already purchased, as well as to offer services and other benefits to our customers and to be able to carry out corresponding measures (e. g. support measures, product improvements, etc.).

Data collection and further data processing take place, for example, as part of contract and order processing by our customer service.

2.1.3 The personal data collected includes the following data in particular:

- Name and address of the interested party/customer,
- first name and surname of the contact person(s) in the company of the interested party/customer,
- position of the contact person(s) in the customer's company,
- if applicable, the name(s) of the customer's management or authorized representative(s),
- other business contact details of the contact person in the company of the interested party/customer (telephone extension, e-mail address, etc.).

Depending on the duration and type of customer relationship, further data may be added, such as billing data, order history, license information and similar. However, this information is generally not personal data.

We may process the date of birth of contact persons and/or members of our clients' management for the purpose of wishing them a happy birthday.

2.2 Purposes of the data processing

We process the personal data of interested parties, potential new customers and existing customers in general for the purpose of preparing (e. g. for contract initiation, preparation and negotiation of offers, sending of information material) or implementing (e. g. in the context of service provision or billing) a contractual relationship or for the purpose of communication and exchange even if no contractual relationship exists or is established.

2.3 Legal basis for data processing

Data processing is always carried out if a contractual relationship exists between us and the interested party/customer or could exist in the future (for the implementation of pre-contractual measures) on the legal basis of Art. 6 (1) (b) GDPR, insofar as the specific data processing is actually necessary for the fulfillment of the contract or for the implementation of pre-contractual measures.

If data processing is not required to fulfill a contract or to carry out pre-contractual measures, our data processing is carried out on the basis of consent granted in accordance with the legal basis of Art. 6 (1) (a) GDPR (consent).

If data processing is not necessary for the performance of a contract or for the implementation of pre-contractual measures and no consent has been given, we process the data because this is necessary to safeguard our legitimate interests, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, prevail, in accordance with the legal basis of Art. 6 (1) (f) GDPR (legitimate interests). Our legitimate interests in this case are to be able to contact potential customers who are not yet in contact with us or who proactively show interest in our services and to be able to enter into an exchange in order to present and offer our services.

2.4 Disclosure of data, third-party providers, service providers, subcontractors (software, tools, applications used)

If necessary, personal data of interested parties/customers will be passed on to third parties. This may include, in particular, disclosure to

- Cloud providers, SaaS providers and other service providers that we use for data processing, data storage, preparation of offers, processing of orders/contracts, agreements, accounting, storage and management of data/information, etc,
- our tax advisor for the purpose of bookkeeping and tax returns,
- lawyers or debt collection agencies to process and enforce any existing claims,
- the provider of our CRM system, which we use to manage and support prospects and customers, and comparable tools and systems that are required to properly manage and process prospect and customer data.

In connection with the (future) customer relationship, in particular for customer acquisition, customer language, customer loyalty and ultimately to enable the fulfillment of our contractual services, we use software, tools and applications from service providers where personal data of interested parties and customers are inevitably processed. These are processors (Art. 28 GDPR) or joint controllers with us (Art. 26 GDPR).

These are:

Software, tool, app	Provider	Place of data processing	Purpose	Legal basis and appropriate guarantees / transfer mechanism
Microsoft Teams Microsoft Azure Microsoft Dynamics 365	Microsoft Inc.	EU USA, worldwide if applicable	Implementation of online training courses (except for the North America region) Customer acquisition and retention; sales support; customer service and support	Art. 6 (1) (b) GDPR (fulfillment of contract) and - in the case of voluntary use of microphone, camera or chat - Art. 6 (1) (a) GDPR (consent) EU-U.S. Data Privacy Framework (DPF)
Adyen	Adyen NV	NL	Credit card payment	Art. 6 (1) (f) GDPR (legitimate interests)
GoToTraining	GoTo Technologies Ireland Unlimited Company	EU, possibly USA	Registration and implementation of online training courses in the North America region	Art. 6 (1) (b) GDPR (fulfillment of contract) and - in the case of voluntary use of microphone, camera or chat - Art. 6 (1) (a) GDPR (consent) EU-U.S. Data Privacy Framework (DPF)

Insofar as the data processing is order processing, we have concluded an order processing contract with the respective provider in accordance with Art. 28 GDPR, which not only gives us rights of instruction and imposes deletion obligations on the third party, but also stipulates that the data is processed by the third party for a specific purpose only. Insofar as there is joint responsibility in accordance with Art. 26 GDPR, we have concluded a corresponding agreement to regulate this joint responsibility.

We have always ensured that the respective provider has taken sufficient protective measures for the data subjects. Otherwise, no data is passed on to third parties. The only exception is if there is a legal obligation to pass on data.

2.5 Storage duration

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected.

In the case of data processing on the basis of a concluded contract or a pre-contractual measure, this is the case when the data is no longer required for the fulfillment of the contract. As a general rule, we store all data collected in connection with the initiation or conclusion of the contract until the end of the contract and until no further claims can be asserted under the contract, i. e. until the statute of limitations expires. The general limitation period according to § 195 BGB is 3 years. However, certain claims, such as claims for damages, only become time-barred after 30 years. If there is justified reason to assume that this is relevant in individual cases (e. g. imminent claims against us), we store the personal data for this period. The aforementioned limitation periods begin at the end of the year (i. e. on December 31) in which the claim arose and the creditor becomes aware of the circumstances giving rise to the claim and the identity of the debtor or should have become aware of them without gross negligence. We would like to point out that we are also subject to statutory retention obligations for tax and accounting reasons. These oblige us to retain certain data, which may also include personal data, for a period of 6 to 10 years as proof of our bookkeeping. These retention periods take precedence over the aforementioned deletion obligations. retention periods also begin at the end of the relevant year, i. e. on 31.12. Data processing that takes place on the basis of consent that has been granted generally takes place until the need for data processing no longer exists, at the longest until the data subject has declared to us that they wish to withdraw their consent (see the information below at 7.8 Right of revocation if consent has been granted.

We store the data collected on the basis of a legitimate interest until the legitimate interest no longer exists, the assessment comes to a different conclusion or the data subject has effectively objected in accordance with Art. 21 GDPR (see the information on 7.8 Right of revocation if consent has been granted). Our legitimate interest no longer exists at the latest if a pre-contractual measure does not result in the conclusion of a contract or if the contractual relationship has ended and the final failure to conclude a contract or the end of the concluded contract is more than three years in the past.

If we are obliged to store certain data for a longer period of time due to retention and documentation obligations under tax and commercial law (this applies in particular to invoices and documents accompanying invoices, but also correspondence of a business nature), we store this data for the duration of the statutory periods on the basis of Art. 6 (1) (c) GDPR.

3 Special data processing

In addition to the general data processing described above, we describe below individual special data processing operations, insofar as the type of data processed, the purposes of the data processing, their legal basis and/or their storage period differ.

3.1 Implementation of the contractual relationship

As part of a customer relationship, a wide range of personal data is naturally processed; in addition to the area of communication, this includes in particular data processing in connection with the order, conclusion of the contract, billing and support. In addition to the usual contact and master data of interested parties and customers, this also includes payment and billing data, as well as any customer support requests and their usage and metadata.

3.1.1 Purposes of data processing

All data processing in connection with the customer relationship is carried out for the purpose of establishing and processing the contractual agreement with the customer and maintaining the customer relationship.

3.1.2 Legal basis for data processing

The data processing is carried out in accordance with Art. 6 (1) (b) GDPR for the fulfillment of the concluded contract or for the execution of pre-contractual measures. The proper fulfillment of the contract requires the processing of customer data.

3.1.3 Storage duration

The personal data will be stored for as long as is necessary to process and fulfill the agreement(s) concluded and, if applicable, for as long as is necessary to defend against or assert claims after termination of the customer relationship, i. e. for the duration of the statutory limitation period.

3.1.4 Possibility of objection or removal

The data processing is related to the upcoming or existing customer relationship and can only be avoided by not entering into a contract with the controller or by terminating the contractual relationship(s) with the controller.

3.2 External payment service providers

3.2.1 Payment service provider Adyen

3.2.1.1 Type of data, purposes and legal bases of data processing

We use the external payment service provider Adyen (Adyen NV, Simon Carmiggeltstraat 6 - 50, 1011 DJ Amsterdam, Netherlands) to process payments for our training courses (see 3.4 Organization of events and training courses).

The personal data required to process a payment, such as your first name, surname, IP address, credit card number, expiry date and CVC code, will be transmitted directly to the payment service provider. The IP address is transmitted to Adyen for the purpose of fraud prevention and detection. All data is transmitted in encrypted form.

Adyen collects and stores the data and only passes it on in encrypted form to the companies involved in the payment process. We do not collect or store the payment data.

Further data protection information about Adyen can be found in Adyen's privacy policy at https://www.adyen.com/de_DE/richtlinien-und-haftungsausschluss/privacy-policy, as well as their cookie policy: https://www.adyen.com/policies-and-disclaimer/cookie-policy.

3.2.1.2 Purposes of data processing

The data processing described here is carried out for the purpose of effective billing and payment processing of bookings for our chargeable events. The IP address is transmitted to Adyen for the purpose of preventing and detecting fraud.

3.2.1.3 Legal basis for data processing

The transfer of data for payment processing as well as for fraud prevention and detection in the context of orders is based on our legitimate interest in accordance with Art. 6 (1) (f) GDPR.

3.2.1.4 Storage duration

We delete personal data when it is no longer required for the aforementioned processing purposes and no statutory retention obligations prevent deletion.

3.2.1.5 Possibility of objection and removal

Data processing can be prevented by refraining from booking our chargeable events. Otherwise, you have the option of objecting in accordance with Art. 21 GDPR.

3.3 Registration and use of the PTV Group ID

3.3.1 Type of data, purposes and legal bases of data processing

Both free and paid use of https://ptvgroup.tech is only possible after successful registration. Upon registration, you will be provided with a PTV Group ID as an ID token. You can then log in with your e-mail address and password.

To register, we need information on the following categories:

- Personal data (first name, surname)
- Your chosen password
- Company information (name of the company)
- Contact details (e-mail address)
- Country/Region

The free use of the PTV Group ID enables you to view the range of services on https://ptvgroup.tech, to register for events and, at the request of existing customers, to be activated as a user for product instances of the PTV Cloud service and to activate a test phase of a PTV Cloud service.

As soon as you wish to use fee-based offers, you must provide additional data about your company such as company address, VAT ID, details for electronic invoicing (including Peppol Participant ID), credit card or bank details (IBAN, BIC).

We would like to point out that no contract can be concluded or executed without this information. You will be informed separately about the processing of your collected data when the respective contract is concluded.

All information about the company is stored as customer data in our internal systems (see the list of applications at 2.4 Disclosure of data, third-party providers, service providers, subcontractors (software, tools, applications used)) and processed for specific purposes. We delete this data if it is no longer required to fulfill your request. The necessity is reviewed at regular intervals. Furthermore, the statutory archiving obligations apply.

The legal basis for the processing is the execution of the contract (Art. 6 (1) (b) GDPR), fulfillment of legal obligations (Art. 6 (1) (c) GDPR), as well as the legitimate interest of PTV (Art. 6 (1) (f) GDPR) to improve and further develop the offer and, if applicable, the consent of the user, if it was given voluntarily (Art. 6 (1) (a) GDPR).

3.3.2 Disclosure of data

3.3.2.1 External hosting

The website https://ptvgroup.tech is hosted by an external service provider (hosting provider). The IP address collected through the website is stored as personal data on the hosting provider's servers.

The PTV Cloud Services, which can be accessed at https://ptvgroup.tech, are also hosted by an external service provider. The personal data processed within these products is stored on the hosting provider's servers. This may include IP addresses, contact requests, meta and communication data, contract data, contact details, names, website accesses and other data.

The hosting providers are used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 (1) (b) GDPR) and in the interest of a secure, fast and efficient provision of our online offer by a professional hoster (Art. 6 (1) (f) GDPR).

Our hosting providers will only process your data to the extent necessary to fulfill their performance obligations and to follow our instructions with regard to this data.

We use the following hosting provider for PTV products:

- Microsoft Azure Cloud, which is provided by Microsoft Ireland Operations Ltd, Carmenhall Road, Sandyford, Dublin 18, Ireland ("Microsoft Ireland"). Hosting takes place in the EU. There is an agreement on order processing between PTV and Microsoft Ireland.

3.3.2.2 Disclosure of personal data

Your personal data collected on https://ptvgroup.tech will only be passed on to third parties if

- you have given your express consent in accordance with Art. 6 (1) (a) GDPR or
- this is necessary pursuant to Art. 6 (1) (b) GDPR for the performance of a contract with you (e. g. transfer of data to payment service providers or credit institutions), or

- there is a legal obligation to pass on data in accordance with Art. 6 (1) (c) GDPR (e. g. to law enforcement or financial authorities), or
- the disclosure pursuant to Art. 6 (1) (f) GDPR is necessary for the establishment, exercise or defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data (e. g. in the event of attacks on our IT systems).

3.3.3 Storage duration

We delete your data if it is no longer required to fulfill the stated purposes. The necessity is reviewed at regular intervals.

This applies in particular where user accounts have been inactive for an extended period of time. A user account is generally considered inactive if no login has occurred for a period of 365 days and there has been no active use of our products or services.

Prior to deletion, we inform the affected users by e-mail about the impending deletion and provide them with the opportunity to prevent the deletion by logging in again.

If no reactivation takes place, the user account will be deleted. The deletion is final and cannot be reversed.

Furthermore, statutory archiving obligations apply.

3.4 Organization of events and training courses

3.4.1 PTV Trainings

PTV offers a wide range of training courses worldwide at https://training.ptvgroup.com/.

3.4.1.1 Registration

Note: for registrations in the North America region, where the training is carried out by PTV America Inc., the data processing declaration in accordance with 3.4.1.3 Registration (North America region) applies.

3.4.1.1.1. Type of data, purposes and legal bases of data processing

We process the following personal data as part of the registration process for training courses. Fields marked with * are mandatory fields that are required for the registration process: Title*, first name*, surname*, company*, street*, postcode*, city*, country*, telephone number*, e-mail address*, VAT identification number*, order number / your internal order reference, participation in previous courses, free text entries in the comments field.

In order to continuously improve our training courses, we also collect voluntary feedback from course participants regarding their preference for online or face-to-face formats when they register for PTV training courses at https://training.ptvgroup.com/. The results are incorporated into the conceptual development of our training courses.

This data is processed to process the registration, organize the training, communicate with the participants and, if necessary, for invoicing. By sending the completed registration form, the data subject submits a

binding offer to participate in a PTV training course. If a contract is concluded, the data provided is required to enable the training to be carried out properly.

The legal basis for the processing is Art. 6 (1) (b) GDPR, as the data processing is necessary for the performance of a contract or for the implementation of pre-contractual measures.

3.4.1.1.2. Disclosure of data

For payment processing via credit card, we use the external service provider Ayden (see 3.2 External payment service providers).

3.4.1.1.3. Storage duration

The personal data will be stored for the duration of the training course and to comply with statutory retention periods. After expiry of these periods, the data will be deleted unless there are further legitimate reasons for longer storage (e. g. for the assertion or defense of legal claims).

3.4.1.2 Support with a visa application

3.4.1.2.1. Type of data, purposes and legal bases of data processing

If you have selected the option *"Yes, I need a letter of invitation for my visa application"* during the registration process (see 3.4.1.1 Registration), additional personal data will also be collected and processed. This includes in particular Title, first and last name, full address, place of residence, telephone number, nationality, date of birth and ID document number. This data is processed exclusively for the purpose of creating an individual invitation letter for presentation when applying for a visa.

A letter of invitation for a visitor's visa serves as formal confirmation from the host in the receiving country that they will assume responsibility for the duration of the visitor's stay. This letter helps the responsible foreign mission (embassy or consulate) to verify the seriousness and legitimacy of the purpose of the visit. It proves that the invited visitor will be adequately cared for during their stay and that there is no intention to stay in Germany illegally.

The purpose of the associated data processing is to enable a lawful stay in the context of a visitor visa. The legal basis for the processing of personal data arises from Art. 6 (1) (b) GDPR, as the data processing is necessary for the performance of a contract or in order to take steps at the request of the data subject prior to entering into a contract.

3.4.1.2.2. Disclosure of data

The data will not be passed on to third parties.

3.4.1.2.3. Storage duration

The personal data will be stored for the duration of the training course and to comply with statutory retention periods. After expiry of these periods, the data will be deleted unless there are further legitimate reasons for longer storage (e. g. for the assertion or defense of legal claims).

3.4.1.3 Registration (North America region)

3.4.1.3.1. Type of data, purposes and legal bases of data processing

We use the GoTo Training registration platform of the provider GoTo Technologies Ireland Unlimited Company, 77 Sir John Rogerson's Quay, Block C, Suite 207, Grand Canal Docklands, Dublin 2, D02 VK60, Ireland to register for training courses in the North America region. GoTo Technologies Ireland Unlimited Company is based in Ireland.

As part of the registration process, personal data such as first name, surname, email address, address, telephone number, organization, job title and, optionally, details of the billing address and license requirements are collected. This data is processed to process the registration, organize the training, communicate with the participants and, if necessary, for invoicing.

The legal basis for data processing is Art. 6 (1) (b) GDPR (fulfillment of contract or implementation of pre-contractual measures).

Further information on data processing by GoTo Technologies Ireland Unlimited Company. can be found in the GoTo Training Data Privacy Statement, available at https://www.goto.com/company/legal/privacy/us and information on the Data Privacy Framework at https://www.goto.com/company/legal/privacy/dpf-notice.

3.4.1.3.2. Disclosure of data

The data collected during registration is transmitted to GoTo Inc. as a processor to ensure the provision and implementation of the training courses. No other data will be passed on to third parties unless we are legally obliged to do so.

GoTo Inc. processes the data on our behalf on the basis of an order processing contract in accordance with Art. 28 GDPR. When transferring personal data to a third country (USA), this is done on the basis of suitable guarantees in accordance with Art. 46 GDPR, in particular by concluding the EU standard contractual clauses.

3.4.1.3.3. Storage duration

The personal data will be stored for the duration of the training course and to comply with statutory retention periods. After these periods have expired, the data will be deleted unless there are further legitimate reasons for longer storage (e. g. for the assertion or defense of legal claims).

3.4.1.4 Implementation of the training courses

We use the video conferencing platform Microsoft Teams, which is operated by Microsoft Ireland Operations Ltd, Carmenhall Road, Sandyford, Dublin 18, Ireland, to conduct the training courses. We have concluded a corresponding data processing agreement (Art. 28 GDPR) for this purpose. You will receive an invitation to participate in the respective training course in advance by e-mail.

For detailed information on the processing of personal data in connection with the use of Microsoft Teams and the sending of e-mails, please refer to our Telecommunications Data Privacy Statement under "Data processing through the use of Microsoft 365", available at https://www.ptvgroup.com/en/data_privacy_statement_communication_en.pdf.

3.4.1.5 Implementation of training courses (North America region)

3.4.1.5.1. Type of data, purposes and legal bases of data processing

PTV America Inc. uses the external service provider GoTo Training, a service of GoTo Inc, 320 Summer Street, Boston, MA 02210, USA, to conduct online training courses in the North America region. Further information about the provider and the processing of personal data can be found at: https://www.goto.com/meeting.

Personal data of the participants is processed in the course of the training sessions via GoTo Meeting. This includes, in particular, name, email address, technical metadata (e. g. IP address, device information), audio and video data (if shared), chat messages and other interactions within the session (e. g. participation in surveys or screen sharing).

The data processing serves the technical implementation of the training, the interaction between instructors and participants as well as quality assurance.

The legal basis for the processing is Art. 6 (1) (b) GDPR (fulfillment of contract) and - in the case of voluntary use of microphone, camera or chat - Art. 6 (1) (a) GDPR (consent).

3.4.1.5.2. Disclosure of data

In order to carry out the training, the above-mentioned data is transmitted to GoTo Inc., which acts as a technical service provider and processor within the meaning of Art. 28 GDPR. No further transmission to third parties takes place unless this is required by law.

As GoTo Inc. is based in the United States, data is transferred to a third country outside the EU/EEA. The protection of personal data is guaranteed by the conclusion of EU standard contractual clauses in accordance with Art. 46 (2) (c) GDPR.

The data protection information of GoTo Meeting can be viewed at: https://www.goto.com/company/legal/privacy.

3.4.1.5.3. Storage duration

The personal data processed during the course will only be stored for as long as is necessary to carry out the training. Any further storage will only take place if there are statutory retention obligations or if the data subject has given their express consent (e. g. for recordings, if consent has been given).

Data that is generated as part of technical connection logs is generally deleted after 30 days at the latest, unless there is a legal obligation or a legitimate interest in longer storage.

3.4.2 PTV Academic Exercises

With the "Academic Exercises for Students", PTV offers training courses specially tailored to students. In half-day sessions, we guide them through PTV's mobility solutions and answer questions from a student perspective. To participate in the program, registration is required, which leads to the processing of personal data.

3.4.2.1 Type of data, purposes and legal bases of data processing

When registering via the platform https://training.ptvgroup.com/en/academic-exercises/, the following personal data is collected: E-mail address, title, first name, surname, country, name of university, field of

study, intended academic degree and the name of the supervising lecturer. You will also be asked which PTV training course (Vissim, Viswalk or Visum) you are registering for. In addition, a valid certificate of study (e. g. proof of enrolment) must be uploaded.

The personal data marked with * are mandatory fields. All data that we are obliged to request from you is required for the implementation of the PTV Academic Exercises.

The PTV Academic Exercises offer aimed exclusively at students. As part of the registration process at https://training.ptvgroup.com/en/academic-exercises/, we therefore also require your certificate of study (or certificate of enrolment) for registration. This usually contains your matriculation number and a unique personal identifier from your university. The purpose of data processing is to provide proof that the participants are actually students at a university. The data processing of the certificate of enrolment is necessary because it is not always possible to provide clear proof via the e-mail address of your university.

The legal basis for data processing is Art. 6 (1) (b) GDPR for the fulfillment of a contract for the implementation of PTV Academic Exercises or a corresponding pre-contractual measure.

The purpose of data processing is the registration for and execution of PTV Academic Exercises. The legal basis is Art. 6 (1) (b) GDPR. This is because the processing of the data is necessary for the implementation of pre-contractual measures and later for the contractual implementation of PTV Academic Exercises.

The data from the optional input fields is helpful and useful for us, so we also ask for this information. The legal basis for data processing is the implied consent provided by you in accordance with Art. 6 (1) (a) GDPR.

3.4.2.2 Disclosure of data

The personal data you provide will be processed exclusively by us. Data will not be passed on to third parties.

No personal data is processed outside the EEA (European Economic Area) and therefore not in so-called third countries.

3.4.2.3 Storage duration

We only need your certificate of enrollment as proof. Once proof of your enrolment has been provided and documented with us, your certificate of enrolment will be deleted after the course has been completed at the latest.

The remaining data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. The deletion takes place at the latest at the end of the course.

3.5 Data processing based on internal guidelines

3.5.1 Type of data, purposes and legal bases of data processing

In order to fulfill its responsibility to the law, employees, customers and business partners, the PTV Group has issued various internal guidelines that must be complied with by all employees as binding work instructions. Personal data may be processed as part of compliance with these guidelines.

This is possible, for example, when reporting a conflict of interest in accordance with the PTV Group's "Conflicts of Interest Policy". According to section 8 of this guideline, (potential) conflicts of interest must

be reported in writing to the respective superior. The report must the names of all persons involved. Employees and third parties must disclose any relationship, activity, role or position if a potential, actual or perceived conflict of interest arises in relation to an employee or business partner and respond promptly and fully to any request for further information from Human Resources or management.

The same applies under the *"Directive on Combating Bribery and Corruption, Gifts and Entertainment, Donations and the Use of Third Parties"*. A due diligence review of business partners must also be carried out on the basis of this directive. Conducting due diligence on business partners ensures that the business partner exists, that its identity and ultimate beneficial owners are verified and that possible links to government officials are identified. The same applies to third parties with whom the PTV Group wishes to work. Based on this policy, reports can be made via the JIRA ticket system on the topics of (a) "Offering and giving Gifts and Entertainment", (b) "Receiving Gifts and Entertainment" and (c) "Social and Charitable Donations". The JIRA ticket system is operated by Atlassian Pty Ltd, Level 6, 341 George Street, Sydney NSW 2000, Australia. Further information on the use of JIRA can be found separately in the privacy policy https://www.atlassian.com/legal/privacy-policy#what-this-policy-covers.

Suspected cases of violations of the internal guidelines must be reported to the Compliance Officer of the PTV Group.

Within the scope of these guidelines - depending on the specific incident/suspicion or the specific report - both names and business contact details, circumstances relating to the persons concerned from their business environment or private behavior/environment with reference to business-relevant circumstances may be the subject of data processing.

The purpose of data processing, which may be carried out through reports based on internal guidelines, is always to investigate reported suspicions of unethical, dubious, illegal behavior or behavior that violates internal compliance rules by employees or partners of the PTV Group and to be able to remedy and prevent such abuses in the future. If necessary, this data processing also serves to initiate or support investigations by the competent authorities.

Data processing is based on the legitimate interests of the PTV Group in accordance with Art. 6 (1) (f) GDPR.

The legitimate interests consist specifically in the fact that the PTV Group is threatened with criminal or administrative sanctions due to conflicts of interest or due to unethical or even criminal behavior by its employees, in addition to significant damage to its image. PTV can be held liable for actions carried out by persons acting on its behalf, including the actions of its third parties. The PTV Group therefore has a legitimate interest in identifying such conflicts of interest or unethical or criminal behavior, eliminating their causes and preventing their recurrence through preventive measures.

The internal guidelines are designed as binding work instructions for employees, meaning that they must be observed and complied with by employees by way of the right to issue instructions under labor law. Therefore, reporting (potential) conflicts of interest or violations of the guidelines on corruption, bribery, gifts, etc. is not voluntary. Instead, failure to make a report that is actually required can lead to disciplinary or labor law consequences.

3.5.2 Disclosure of data

The circle of persons who may come into contact with such personal data is kept as small as possible, both when reporting conflicts of interest and when reporting gifts and invitations.

In the event of a conflict of interest, the relevant superior, the Compliance Officer and/or Human Resources will generally receive such data. If a conflict of interest is material and the situation is considered unmanageable, Human Resources will inform the third party or the employee and his or her direct superior, the senior manager and the person who holds the position of Vice President of the department concerned.

3.5.3 Storage duration

PTV Planung Transport Verkehr GmbH will retain the records necessary to adequately manage the risk associated with the conflict of interest or to process the reports of gifts and invitations for the period necessary to manage the conflict of interest or to process the report of gifts and invitations. Insofar as there are no legal obligations to store the data for longer, it will be stored for a maximum of two years.

3.6 Processing of personal data for the purpose of conducting customer satisfaction surveys

The person responsible may conduct customer satisfaction surveys. Participation in these surveys is always voluntary. The personal data provided by the customer in this way is part of the data processing described here.

3.6.1 Purposes of data processing

All data processing is carried out for the purpose of gaining knowledge of the person responsible for the satisfaction of customers with the services and services and thus indirectly to improve and optimize these services and services.

3.6.2 Legal basis for data processing

The data processing is carried out in accordance with Art. 6 (1) (f) GDPR on the basis of the legitimate interests of the controller. The legitimate interests consist of the aforementioned purposes.

3.6.3 Storage duration

The personal data is stored for as long as is necessary to gain further insights for the improvement of our own services and is then immediately deleted or anonymized.

3.6.4 Possibility of objection or removal

Data processing can be avoided by not participating in the surveys. Even after participation, the subsequent termination of data processing is possible by objecting in accordance with Art. 21 GDPR (see below on the rights of data subjects).

3.7 Processing of personal data to ensure the integrity of our information technology systems

We have taken various measures to protect our information technology systems. This is necessary both for legal reasons and for reasons of corporate due diligence. Under certain circumstances, this may also involve the processing of personal data, primarily the IP addresses or identifiers (Globally Unique Identifier, GUID) of users, and possibly metadata on the use of our services and websites.

3.7.1 Purposes of data processing

All data processing in connection with the protection of our information technology systems is carried out for our protection, for fraud prevention and to prevent criminal offenses and attacks against our data or the data of our interested parties, customers, employees, business partners, etc.

3.7.2 Legal basis for data processing

The data processing is carried out in accordance with Art. 6 (1) (f) GDPR on the basis of the legitimate interests of the controller. The legitimate interests consist of the aforementioned purposes.

3.7.3 Storage duration

The personal data will be stored for as long as is necessary to fulfill the stated purposes.

3.7.4 Possibility of objection or removal

The data processing is related to the general protection of the controller's company and cannot be avoided. However, objection is possible in accordance with Art. 21 GDPR (see below on the rights of data subjects).

4 Data transfer to third countries

Personal data may also be processed outside the EEA (European Economic Area) and thus in so-called third countries.

You can see which providers may transfer and process data in third countries in this privacy policy when naming the data processing and the respective tools or service providers.

In principle, this may also be a country for which there is currently no EU adequacy decision, i. e. in which the level of data protection is not recognized as equivalent to that of the EU, whereby we always strive to transfer data only to secure third countries.

For the USA, there is an adequacy decision by the EU pursuant to Art. 45 (1) GDPR, which certifies that the USA has an adequate level of data protection, which means that data transfers to the USA are generally permitted. The prerequisite for this is that the third-party providers from the USA have each certified themselves under the EU-U.S. Data Privacy Framework (DPF). This is generally the case with the US providers selected by us. This means that data transfers to these third-party providers are permitted without further ado.

All companies for which a third country transfer is considered and which (could) transfer personal data to a third country for which there is no EU adequacy decision or US companies that have not certified themselves under the EU-U.S. Data Privacy Framework (DPF) have provided sufficient guarantees for data transfer in accordance with the GDPR and the European Court of Justice (ECJ) by binding agreement of the EU Standard Contractual Clauses (SCC, Art 46 (2) (c) GDPR) with us and by agreeing additional data security measures, they have provided sufficient guarantees for data transmission in accordance with the GDPR and the European Court of Justice (ECJ) and have submitted to a level of regulation that is fundamentally comparable to the EU level of data protection. The transfer of data to these companies is therefore generally permitted (see Art. 44 et seq. GDPR).

Furthermore, in the case of order processing, corresponding order processing contracts have been concluded with these companies to secure the data and our rights to issue instructions or, in the case of joint responsibility, corresponding agreements on this.

5 Information and Policies for Users in the USA

The following policy terms of this section are applicable to users in the USA and are in addition to the provisions of this Privacy Policy.

If you are in the United States, our services and the processing of data may be undertaken by PTV America Inc. or PTV Planung Transport Verkehr GmbH.

We and the affiliated companies of PTV Group have responsibility for the protection of your personal data (Art. 26 GDPR) and under other laws that may be applicable to the processing of personal and consumer information.

5.1 Your California Privacy Rights

If you are a California resident, you have the right under to the California Consumer Privacy Act (CCPA) to request:

1. The categories of personal information we have collected about you;
2. The categories of sources from which the personal information is collected;
3. The business or commercial purpose of collecting or selling personal information;
4. The categories of third parties with whom we share or sell personal information
5. The categories of personal information about you that we have sold; and
6. The specific pieces of personal information we have collected about you.

Additionally, you have the right to request deletion of your personal information, the right to opt out of the sale of your information (if applicable) and the right not to be discriminated against for exercising any of your CCPA rights.

In the twelve (12) months preceding the Effective Date of this Privacy Policy, we may have collected or received from you and from third parties in connection with providing our services, information about California consumers in each of the following categories and disclosed the information to our service providers, distributors and resellers for business purposes as described in this Policy:

1. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
2. Any categories of personal information described in subdivision (e) of Section 1798.80.
3. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
4. Geolocation data.
5. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet websites, application, or advertisement.
6. Audio, electronic, visual, thermal, olfactory, or similar information.
7. Professional or employment-related information.
8. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We do not sell personal information for monetary consideration under CCPA. Personal data may be provided to our services providers and to third parties under Section 1798.140(t)(2)(A) of the CCPA. In the event that the use of third-party cookies constitutes a "sale" under CCPA, you may opt out of the use of such cookies

Our contact information is listed at the offend of this section. You may submit a request by e-mail or hard copy form. We will ask for your name, address and state of residence. If your name and email address are insufficient to verify your identity and assess your privacy request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA privacy request.

California "Shine the Light" Information-Sharing Disclosure: California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to info.us@ptvgroup.com with *"California Shine The Light Rights"* in the subject line.

5.2 Do Not Track Technologies

Some browsers may have settings to request that websites *"Do Not Track"* your activity or usage. At this time, our websites may not accommodate these technologies and your requests may not be able to be honored on our websites. We do use cookies and other technologies to track your usage and other information about your visit to our websites.

5.3 COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

The websites and services are not general audience websites. We do not sell products to individuals under 18 years of age. No one under the age of 18 may provide any Information to or on the websites. We do not knowingly collect personally identifiable information from individuals under 18. If you are under 18, do not use or provide any Information on this Websites or on or through any of its features, do not register on the websites, use any of the features of the websites, or provide any Information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

5.4 CAN SPAM Act

We may collect your email address from our websites in order to identify visitors and to communicate with you. If at any time you would like to unsubscribe from receiving future emails, please click the “unsubscribe link at the bottom of the email or tell us on the ‘Contact us’ page and we will promptly remove you from all correspondence.

5.5 Contact

Customers in the USA can contact us at:

PTV America, Inc.
1530 Wilson Boulevard
Suite 510
Arlington, VA 22209 USA
Phone: +1 800-608-0377

E-Mail address: info.us@ptvgroup.com

6 Information and Policies for Users in Canada

The following policy terms of this section are applicable to users in Canada and are in addition to the provisions of this Privacy Policy.

If you are in Canada, our services and the processing of data may be undertaken by PTV Planung Transport Verkehr GmbH.

We and the affiliated companies of PTV Group have responsibility for the protection of your personal data (Art. 26 GDPR) and under other laws that may be applicable to the processing of personal and consumer information.

6.1 Data Transfers

Our website and services use, in particular, tools from companies based in other countries, such as the United States of America, and we may also engage external service providers and other third parties (collectively, *“service providers”*) on our behalf to perform certain services on our behalf and to otherwise provide our service and solution. These service providers may store, process and transfer your personal information on servers located outside of Canada in jurisdictions whose data protection laws may differ from those of Canada, such as the United States of America. As a result, personal information may be

subject to access requests from governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts to ensure that appropriate protections are in place to require our service providers to maintain protections on personal information that are equivalent to those that apply in Canada.

If you have questions regarding our policies and practices with respect to our use of service providers outside of Canada, including with respect to the collection, use, disclosure or storage of personal information by service providers outside of Canada for us or on our behalf, please contact us as set out in section 6.4 Contact Us below.

6.2 Canada's Anti-spam Legislation

We understand and support our obligations under Canada's anti-spam legislation (CASL). As part of signing up to receive our services, you may have also opted in to receive commercial electronic communications from us. If you opted-in to receive such communications, we may use the information to: communicate with you regarding our products, services and promotions; provide you with other information that you request; and/or improve our product and service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our e-mail or other communications at any time and we will ensure that our e-mails or other communications include instructions on how to unsubscribe if you no longer wish to receive future correspondence from us. We provide an on-going opportunity to unsubscribe or opt-out of contact by us by accessing our website or by e-mail to data-protection@ptvgroup.com.

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under CASL; (ii) to send you notices of changes to our Privacy Policy; or (iii) to receive service related messages.

6.3 Individual Access and Accuracy of Personal Information

You may request access to your personal information which we may hold by contacting us at the contact information set forth below, and we will respond within the time periods provided for under applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for such access request unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

You may request to update and change your personal information at the contact information set forth below. We will endeavor to correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information will be transmitted to third parties having access to such information.

6.4 Contact Us

Customers in Canada can contact our external data protection officer as follows:

E-mail: data-protection@ptvgroup.com

7 Your rights as a data subject in Europe (GDPR)

If your personal data is processed, you are the *"data subject"* and you have the following rights vis-à-vis us as the controller:

7.1 Right of access

You have the right to obtain confirmation from us free of charge as to whether we are processing personal data concerning you. If this is the case, you have a right to information about this personal data and to further information, which you can find in Art. 15 GDPR. You can contact us by post or email for this purpose.

Requests for information can be addressed to:

PTV Planung Transport Verkehr GmbH
Haid-und-Neu-Str. 15
76131 Karlsruhe, Germany

E-mail address: data-protection@ptvgroup.com

7.2 Right of rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You also have the right - taking into account the above-mentioned purposes of processing - to request the completion of incomplete personal data, including by means of a supplementary declaration. You can contact us by post or e-mail for this purpose.

7.3 Right to erasure

You have the right to demand the immediate deletion of personal data concerning you if one of the conditions of Art. 17 GDPR is met. You can contact us by post or email to exercise this right.

7.4 Right to restriction of processing

You have the right to demand that we restrict processing if one of the requirements of Art. 18 GDPR applies. You can contact us by post or email to do this.

7.5 Right to notification

If you have asserted the right to rectification, erasure or restriction of processing against the controller, the controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed

of this rectification or erasure of the data or restriction of processing, unless this proves impossible or involves a disproportionate effort.

You have the right to be informed about these recipients by the controller.

7.6 Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance from us, where the requirements of Art. 20 GDPR are met. You can contact us by post or email for this purpose.

7.7 Right to object to processing based on legitimate interest and for direct marketing purposes

Insofar as we process personal data on the basis of Art. 6 (1) (f) GDPR (i. e. due to legitimate interests), you have the right to **object** to the processing of your personal data by us **at any time** for reasons arising from your particular situation. If we cannot demonstrate compelling legitimate grounds for further processing which override your interests, rights and freedoms, or if we process your data for direct marketing purposes, we will no longer process your data (see Art. 21 GDPR). You can contact us by post or email for this purpose.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

7.8 Right of revocation if consent has been granted

You have the right to revoke your consent to the collection and use of personal data at any time with effect for the future. To do so, you can contact us by post or e-mail. This does not affect the legality of the processing carried out on the basis of the consent until revocation.

7.9 Automated decision-making including profiling

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. Unless the decision is necessary for the conclusion or performance of a contract between you and us, it is permissible on the basis of Union or Member State legislation to which we are subject and this legislation contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or the decision is made with your express consent. We do not carry out such automated decision-making.

7.10 Voluntary nature of the provision of data

If the provision of personal data is required by law or contract, we will always point this out when collecting the data. In some cases, the data collected by us is required for the conclusion of a contract, namely if we would otherwise not be able to fulfill our contractual obligation to you, or not sufficiently.

You are under no obligation to provide the personal data. However, failure to provide it may mean that we are unable to perform or offer a service, action, measure or similar requested by you or that it is not possible to conclude a contract with you.

7.11 Right to lodge a complaint with a supervisory authority

Without prejudice to any other rights you may have, you have the right to lodge a complaint with a supervisory authority for data protection, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that is processing personal data concerning you in breach of data protection law.

To exercise **all** these rights, simply send an e-mail to data-protection@ptvgroup.com.