

## **Data Privacy Statement**

(in accordance with Articles 13 and 14 of the General Data Protection Regulation)  
for Participants at Events

The organiser, a member of the HOLTER Group, is the data controller with responsibility for processing your data.

The HOLTER Group comprises Fritz Holter GmbH, Holter Großhandel GmbH, Holter Verwaltungs GmbH and Holter Heizung-Service GmbH, each with its registered office at Sengerstraße 27 in 4600 Wels, Austria, Gebäude- und Regeltechnik GmbH, with its registered office at F.-W.-Scherer-Straße 40 in 5020 Salzburg, Austria, and Holter Großhandel Deutschland GmbH, Am Schwindgraben 1, 93083 Obertraubling, Germany.

If you have any questions about this Data Privacy Policy or about data protection at HOLTER in general, please contact the Data Protection Officer of the HOLTER Group at [daten-schutz@holter.at](mailto:daten-schutz@holter.at).

When holding events of a member of the HOLTER Group, we collect the personal data of event participants for the purpose of carrying out online seminars, in-person seminars and customer events; we do so on the legal basis of a valid agreement or pre-contractual measure as well as our legitimate interest in ensuring efficient business processes.

We process names, contact details, company membership, any agreements and the history of communication and participation.

Photos of the event shall be taken in the legitimate interest of documenting corporate history and shall only be used for the internal purpose of optimising the range of events we offer. We shall only publish photos upon obtaining your consent – see below.

The provision of the aforementioned data is necessary for the business relationship, as we would otherwise not be able to meet our contractual or statutory obligations.

If we are permitted to see you on HOLTER's premises, we shall process your name, contact details, company membership and function; we shall do so in the legitimate interest of maintaining good customer relations, to coordinate an appointment with you and so that we can welcome you on a monitor in the entrance area.

Unless you give your consent, we shall, in principle, not disclose these data to third parties, unless such disclosure is required by law or unless it is necessary for the fulfilment of contractual obligations (e.g. data transfer to speakers, hotels, golf clubs, sports organisers, travel agencies, persons responsible for plant visits for the organisation of events). Another exception is data disclosure to processors who work exclusively on the instruction of HOLTER, do not use the data for their own purposes and are bound by their own agreements to data protection obligations specified in the General Data Protection Regulation.

In some cases, data may also be transferred to non-EU countries. To safeguard the rights and freedoms of data subjects, agreements have been concluded in accordance with the standard contractual clauses (GDPR Article 46) approved by the EU Commission, and additional contractual obligations have been undertaken to ensure a data protection level that is equivalent to data protection within the EU.

Once the statutory retention period has lapsed, data are stored for no more than 5 years from the last time we had contact with you. You have a right of data access, rectification and erasure of data as well as a right to restriction of processing, a right to object to processing (concerning, in particular, the sending of direct advertising) and a right to data portability to a different controller. You are entitled to lodge a complaint with a supervisory authority.

## **Data Privacy Policy for Participation in Online Meetings and Video Conferences on Microsoft Teams**

When carrying out online meetings and video conferences, we process personal data in the form of contact details as well as video and audio data. Such processing is necessary for the fulfilment of contractual obligations and pre-contractual measures (e.g. employees' employment contracts, preliminary project meetings), unless it is possible to make efficient use of other, less stringent measures, and shall only continue for the duration of the relevant meeting.

Any data concerning your participation in online meetings and any text entered by participants in the chat window of the meeting shall be deleted upon the expiration of the statutory retention periods (generally seven years).

In exceptional cases, we shall make a recording of the online meeting for the purpose of documentation, quality control or drawing up minutes. This is done either to meet contractual obligations or to satisfy HOLTER's legitimate interest in the aforementioned processing purposes and not until all attending participants have been notified. You have a right to object if you are in a specific situation where your rights and freedoms override HOLTER's interests. Recordings shall only be stored until the relevant processing purpose has been completed, e.g. the creation and confirmation of minutes.

Data processed while carrying out online meetings shall, in principle, not be disclosed without your consent. An exception, however, shall be made for data disclosure to processors if they work exclusively on the



instruction of HOLTER, do not use the data for their own purposes and are bound by their own agreements to comply with the data protection obligations under the General Data Protection Regulation, and an exception is also made for the disclosure of diagnostic and telemetric data to Microsoft Ireland Operations Ltd., One Microsoft Place, Dublin, D18 P521, Ireland, where such disclosure is required for the operation and safeguarding of the infrastructure of an online meeting, which may also, in principle, include the disclosure of personal data. In rare cases, data may also be transferred to non-EU countries. To safeguard the rights and freedoms of data subjects, we have concluded an agreement with Microsoft in accordance with the standard contractual clauses (GDPR Article 46) approved by the EU Commission, and additional contractual obligations have been undertaken by Microsoft to ensure a data protection level that is equivalent to data protection within the EU.

## Photo and video recordings for promotional purposes and social media

We shall process your personal data in the form of photos or video recordings for promotional purposes in business communication (e.g. photos in Holter Online, newsletters, brochures, press articles, own websites or websites of affiliated companies as well as on social media). However, we shall only do so if you have given us your consent (GDPR Article 6 (1) a). Upon your consent, HOLTER may also publish photos and video recordings of you on social media (e.g. Facebook, Instagram, TikTok, etc.).

HOLTER may process your data until you revoke your consent, although HOLTER may erase your data earlier if there is no longer any need for the recordings. We shall disclose data to processors (e.g. for the purpose of storage, technical processing of recordings and the creation of information materials), ensuring that they are not permitted to use the data for their own purposes and are bound by the strict provisions of the General Data Protection Regulation, and we shall also disclose data to media companies and other enterprises within the HOLTER Group for the same promotional purposes.

When you consent to the publication of photos and video recordings on social media, you expressly give your consent under GDPR Article 49 (1) a that your data may be transferred to non-EU countries that do not have an equivalent level of data protection.

Your consent is voluntary and may be revoked at any time with future effect. To do so, it is sufficient to send a written message to [datenschutz@holter.at](mailto:datenschutz@holter.at).