

## Information on Data Protection according to GDPR

### - Customer and their employees -

As controller in the meaning of GDPR (EU GDPR & UK GDPR), we take the protection of personal data seriously and process it according to the legal regulations.

#### 1. Controller in Terms of Data Protection

The Aareon company with which the customer agreement has been concluded is controller for fulfilling the agreement and initiating further business relations. The Aareon Group companies are also joint controllers for marketing measures (e.g. invitations to events, surveys) and intragroup sales reporting.

- Aareon Group GmbH, Isaac-Fulda-Allee 8, 55124 Mainz, e-mail: [info@aareon.com](mailto:info@aareon.com)
- Aareon Deutschland GmbH, Isaac-Fulda-Allee 8, 55124 Mainz, e-mail: [info@aareon.com](mailto:info@aareon.com) (incl. former Aareon RELion GmbH)
- Calcon Deutschland GmbH, Beethovenplatz 4, 80336 München, e-mail: [info@calcon.de](mailto:info@calcon.de)
- First Financial Software GmbH, Isaac-Fulda-Allee 8, 55124 Mainz, e-mail: [info@first-financial.biz](mailto:info@first-financial.biz)
- GAP Gesellschaft für Anwenderprogramme und Organisationsberatung mbH, Neidenburger Straße 24, 28207 Bremen, e-mail: [info@gap-group.de](mailto:info@gap-group.de)
- HausPerfekt GmbH, Campus Fichtenhain 71, 47807 Krefeld, e-mail: [info@hausperfekt.de](mailto:info@hausperfekt.de)
- Immo Software AG, Isaac-Fulda-Allee 8, 55124 Mainz, e-mail: [realestate@aareon.com](mailto:realestate@aareon.com)
- Locoia, Falkenried 29, 20251 Hamburg, e-mail: [info@locoia.com](mailto:info@locoia.com)
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- Stonal SAS, 28 cours Albert 1er, 75008 Paris, France, e-mail: [contact@stonal.com](mailto:contact@stonal.com)
- Aareon Nederland B.V., Cornelis Houtmanstraat 36, 7825 VG Emmen, Netherlands, e-mail: [info@aareon.nl](mailto:info@aareon.nl)
- Blue-Mountain, Oude Kijk in 't Jatstraat 14, 9712 EG Groningen, Netherlands, e-mail: [info@blue-mountain.nl](mailto:info@blue-mountain.nl)
- Embrace The Human Cloud B.V., Griffeweg, 97-7, 9723 DV Groningen, Netherlands, e-mail: [hallo@embracecloud.nl](mailto:hallo@embracecloud.nl)
- ViaData, Businesspark Friesland, West 45, 8447 SL Heerenveen, e-mail: [info@viadata.nl](mailto:info@viadata.nl)
- Momentum Software AB, Sveavägen 31, 111 34 Stockholm, Sweden, e-mail: [info@momentum.se](mailto:info@momentum.se)
- Aareon Norge AS, C.J Hambros plass 2 Bygg C, 0164 Oslo, Norway, e-mail: [info@aareon.no](mailto:info@aareon.no)
- Aareon Sverige AB, Flöjelbergsgatan 10, 431 37 Mölndal, Sweden, e-mail: [info@aareon.se](mailto:info@aareon.se)
- Aareon UK Ltd, 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: [uk.reception@aareon.com](mailto:uk.reception@aareon.com)
- Arthur Online Ltd., 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: [sales@arthuronline.co.uk](mailto:sales@arthuronline.co.uk)

- Designer Software Ltd. (HomeMaster), International House, 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: enquiries@homemaster.co.uk
- Housing Online Ltd. (HOL), International House, 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: info@housing-online.com
- MIS Active Management Systems Limited (MIS AMS), International House, 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: ask@mis-ams.com
- Tactile Ltd. (Fixflo), 36-38 Cornhill, London, England, EC3V 3NG, United Kingdom, e-mail: info@fixflo.com
- Aareon Proptech Spain S.L., C/ Albasanz, 14, 1ª Planta. Edificio Verona, 28037 Madrid, Spain, e-mail: iesa@iesa.es
- CENTRE DE RECURSOS, ADMINISTRACIÓN I, MANTENIMENT S.L.U., C/ Albasanz, 14, 1ª Planta. Edificio Verona, 28037 Madrid, Spain, e-mail: iesa@iesa.es

The joint controllers have concluded an agreement according to which the data of interested parties will be used by Aareon AG for marketing measures (e.g. invitations to events, surveys) and intragroup sales reporting.

- For customers and their employees of Aareon Group companies in Germany, Aareon AG is the main office for determining the lead supervisory authority.
- For Interested Parties and their employees of Aareon companies in France, Nederland, Norway, Spain, Sweden and the UK, this company is the main office for determining the lead supervisory authority.

## 2. Contact with the Data Protection Officer

- of the Aareon Group companies in Germany and Austria by e-mail: privacy@aareon.com
- of Aareon France SAS by e-mail: fr-dpo@aareon.com
- of Stonal SAS by e-mail: contact@stonal.com
- of Aareon Group companies in Netherlands by e-mail: privacy@aareon.nl
- of Momentum Software AB by e-mail: dataskyddsbud@momentum.se
- of Aareon Norge AS, Aareon Sverige AB by e-mail: dataskyddsbud@aareon.com
- of Aareon UK Ltd. by e-mail: dp@aareon.com
- of Arthur Online Ltd by e-mail: support@arthuronline.co.uk
- of Designer Software Ltd. (HomeMaster), Housing Online Ltd. (HOL) and MIS Active Management Systems Limited (MIS AMS) in UK, by e-mail: dp@aareon.com
- of Tactile Ltd. (Fixflo) by e-mail: dpo@fixflo.com
- of Aareon Proptech Spain, S.L. by e-mail: dpd@iesa.es
- of CENTRE DE RECURSOS, ADMINISTRACIÓN I, MANTENIMENT S.L.U. by e-mail: dpd@iesa.es

## 3. Purpose and Lawfulness of Processing

Execution of the customer relationship and fulfillment of contract according to Art. 6 Abs. 1 b) GDPR. Business initiation as well as marketing with a legitimate interest according to Art. 6 para. 1 f) for business initiation as well as marketing and/or consent according to Art. 6 para. 1 a) GDPR. Data subjects may oppose to the legitimate interest and revoke consent at any time.

#### 4. Data and Categories of Data

<b>Customers (as far as natural persons)</b>	billing and payment data
	Address
	Bank details
	Support information, including customer development and previous contacts
	Creditworthiness data
	Data to opt-in or opt-out of marketing activities (Declared consent to receive promotional notifications and other information)
	advertising measures, newsletter registration, advertising objections)
	Photos
	Date of birth
	Contact details (phone, fax, e-mail)
	Customer number
	Name + name supplements (Mr./Mrs., academic title)
	Product or contract interest (for upselling)
	Other data that may be required for identification purposes under the Money Laundering Act
	Contract data
	Videos (recorded at events)
<b>Employees of Customers</b>	Address (usually business address)
	Data to opt-in or opt-out of marketing activities (Declared consent to receive promotional notifications and other information) advertising measures, newsletter registration, advertising objections)
	Photos
	Date of birth
	Contents (participation in workshops and training courses, statements on content (e.g. error messages, acceptance, instructions, concretization...))
	Contact details (phone, fax, e-mail)
	Name + name supplements (Mr./Mrs., academic title)
	Videos (recorded at events)

#### 5. Recipient and Categories of Recipients

Relevant employees of involved departments and associated companies, processors. For prospect and client data, Aareon uses cloud services from Hubspot® and Salesforce®, for internal use, Aareon uses Microsoft® Office applications (e.g. Word®, Outlook®), Jira of Atlassian and Zendesk® (as ticket system), where storage takes place in the EU, but possible access to data from outside the EU/EEA may occur. For Hubspot®, Microsoft®, Salesforce® and Zendesk® the EU-US Privacy Framework and EU Standard Contractual Clauses apply and for Salesforce® and Zendesk® also Corporate Binding Rules apply as well as for Jira of Atlassian the EU Standard Contractual Clauses apply, which are available on the companies' respective websites.

For a customer solution with SAP®/Blue Eagle, the following applies: For individual customers, SAP support is provided with worldwide support from the SAP support organization. Subcontractors with EU Standard Contractual Clauses can be viewed in the SAP support portal. Individual customers can activate "EU Access" in the SAP support portal. For ASP and hosting customers, Aareon activates EU

Access, where SAP support is provided only from the EU/EEA and Switzerland, subject to an adequacy decision by the EU Commission. In individual cases, worldwide processing within the SAP support organisation can be carried out with the consent of the customer, for which the EU Standard Contractual Clauses apply.

For a customer solution with Microsoft® Office 365, the following applies: If the data is hosted in the Microsoft Azure Cloud or Microsoft Support is provided, it may be possible to access data from outside the EU/EEA. For this purpose, EU-US Privacy Framework and EU Standard Contractual Clauses apply via the Microsoft Customer Agreement and are available in the Microsoft Trust Center.

Aareon is obliged to cooperate in the fight against terrorism and carries out a data comparison with EU/US anti-terror lists and in UK also the UK anti-terror lists (sanction screening). The comparison is performed regarding the customer, not its employees. Aareon uses the AEB system for this purpose, for which support can be provided from outside the EU/EEA (UK, Singapore) if required. The UK is considered a safe third country in accordance with the EU Commission's adequacy decision, and EU Standard Contractual Clauses apply to support from Singapore. In the case of international data transfer to or access from outside the EU, there are special risks for personal data (e.g. access by foreign intelligence agencies).

## **6. Storage Period**

The data will be stored in compliance with the legal retention periods according to each country, for example, in Germany up to 10 years after termination of the customer relationship or performance of the sanction screening. Data that is no longer needed will be deleted. Data based on a consent will be stored until revocation. Data based on a legitimate interest will be stored for as long as the legitimate interest exists, until objection or in the case of leads (e.g. download whitepaper) after 2 years inactivity and in the case of contact (e.g. contract negotiation) up to a maximum of 7 years after the last contact with the company or the data subject.

## **7. Data Subject Rights**

The data subject has the right of access from the controller about the personal data, rectification, erasure, restriction of processing, revocation or objection for the future, data portability and appeal to a supervisory authority.

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