



TerminApp GmbH Guidelines for Data Privacy Protection

A. Preamble

Dear customers, partners, and investors,

Data privacy and our information security are an important part of our services and our offers. Our customers put their personal data in our hands. These guidelines should explain how we perceive our responsibility in the realm of privacy protection and it should offer a transparent overview of the basic principles of our day-to-day dealing with personal data.

B. Responsibilities

The management of TerminApp GmbH (TerminApp) is responsible for ensuring that data processing takes place in line with the requirements of the General Data Protection Regulation (GDPR) EU, as well as the Federal Data Protection Act (*Bundendatenschutzgesetz, BDSG*). Further responsibilities at TerminApp are allocated as follows:

Rights of the affected person: Customer Care Division

Violations of data privacy: Privacy & Legal Division

Processing directory: Contract Management

Data Protection Officer: TerminApp GmbH, Balanstr. 73, Bldg. No. 24, 3. OG, D-81541 Munich, Germany, dataprivacy@timify.com

C. Goals

TerminApp is committed to observe the regulations for data protection as outlined by law, in particular concerning absolute adherence to the EU Guidelines on Data Protection as well as the Federal Data Protection Act (*Bundendatenschutzgesetz, BDSG*) regarding data processing in accordance with data protection, and in compliance with the Data Protection Regulations as defined by the company, with strict preservation of privacy and confidentiality, and the unequivocal protection against access by unauthorised persons.

D. Principles

Fairness and Lawfulness: During the processing of personal data, TerminApp always preserves the informational right of self-determination of the person concerned. Personal data will only be stored and processed in a lawful manner.

Permissible Purpose: The processing of personal data by TerminApp will only be for those purposes which have been defined as permissible for the collection of data.

Transparency: TerminApp continues to inform the person concerned about the handling of their data, the identity of the controller, the purpose of data processing, the data retention period, and third parties or categories of third parties to which the data may be transferred.

Data reduction and data economy: TerminApp continues to research the necessity of obtaining data and the required size in order to reach the intended processing goal. Anonymised or statistic data will be used if possible and when the investment in relation to the intended goal is deemed appropriate.

Erasure and storage limitation: TerminApp will erase personal data which, at the end of the lawful retention period or the period related to business processes, are not necessary any longer.

Factual accuracy and currentness of data: TerminApp will always save personal data correctly, completely, and—insofar as necessary—of current status.

Confidentiality and data security: TerminApp is obliged to deal with personal data in a confidential manner and protect it against unauthorised access, illegal processing or transfers, as well as loss, alteration or damage, by using appropriate organisational and technical measures.



E. Data transfer

We obligate all recipients of data to always use the data in alignment with the specified purposes, following the instructions of TerminApp and ensuring appropriate safety precautions on a continuous basis. TerminApp chooses contractors based on their ability to guarantee the required technical and organisational safety precautions. Processing of data in third countries will only take place if the contractor can prove to TerminApp a similar level of data protection in relation to these Guidelines for Data Privacy Protection, as well as our additional basic principles for data protection. TerminApp will continue to close obligatory contracts for the processing of data and will monitor the adherence to the rights and duties of these contracts on an ongoing basis.

F. Security

TerminApp protects personal data at all times against unauthorised access, unlawful processing or transfer, as well as against loss, falsification, or damage. When TerminApp introduces new methods for data processing—in particular new IT systems—technical and organisational measures for the protection of personal data are specified and implemented.

G. Control

The adherence to the guidelines for data protection and the effective Data Protection Act is often reviewed by data protection audits as well as examinations and trainings. The results of the data protection control is communicated to the company management and done to lay a basis for potential adjustments in dealings with personal data.

H. Rights

The following rights apply to every person concerned:

- You can request information on which—if any—of your personal data we collect and save.
- In the case of personal data being incorrect or incomplete, you may request for corrections or additions to be made.
- You may object to the processing of your personal data (e.g. for marketing purposes), unless a statutory provision obliges us to continue processing the data.
- You are entitled to request the removal and constriction of your data, when for instance the legislative basis for the processing of that particular data is absent or has ceased to exist.
- You can retract your agreement to the processing of data, and you have the right to request the transfer of the personal data provided by you.
- In case of questions or complaints, you can contact our Data Protection Officer or our Supervisory Authority at any time.

Munich, 24 May 2018