

PRIVACY POLICY

Thank you very much for your interest in our Franka World Platform (hereinafter "**Platform**") and our services provided on it (hereinafter "**FE Services**"). The protection of personal data in the context of the use of the Platform and the FE Services is very important to us. We respect your privacy. This is why we only collect and process your personal data in accordance with the applicable statutory provisions.

1 CONTROLLER AND DATA PROTECTION OFFICER

- 1.1 The controller within the scope of the EU General Data Protection Regulation (Art. 4 no. 7 GDPR) is the FRANKA EMIKA GmbH, Infanteriestrasse 19, Building 3, 80797 Munich, Germany, phone +49 89 200 6069-20, email: info@franka.de (hereinafter "**FE**," "**we**," "**our**," "**us**" etc.).
- 1.2 FE's data protection officer is Matthias Hassler, Projekt 29 GmbH & Co. KG, Ostengasse 14, 93047 Regensburg, Germany, phone: +49 941 298 693-0, fax: +49 298 693-16, email: m.hassler@projekt29.de.

2 WHAT IS PERSONAL DATA

Personal data is all information that can be associated with you individually (cf. Art. 4 no. 1 GDPR). This includes e.g. your name, your address, your phone number and your email address. On the other hand, general information by means of which you cannot be identified does not constitute personal data. Such information includes e.g. the number of users of the Platform.

3 WHAT TYPES OF PERSONAL DATA DO WE COLLECT AND PROCESS FOR WHICH PURPOSES

3.1 Webserver protocols (including the IP address)

When you visit our Platform, due to technical requirements, our web server will automatically record your full IP address, the date and the time at which you are visiting the Platform, the web pages you access on the Platform, the web page you visited before accessing the Platform, the browser you use (e.g. Mozilla Firefox, Google Chrome etc.), the operating system you use (e.g. Windows 10, MacOS etc.), and the domain name and address of your Internet provider (e.g. Deutsche Telekom). This information is required for the technical transmission of the web pages of the Platform and the secure operation of the server. This information is not merged with other data sources.

We process this information in order to observe and monitor the stability, functionality, and technical performance of the Platform and the FE services and in order to detect, identify, eliminate and solve any potential problems and errors on the Platform and within the FE Services. The legal basis for the processing of this information is our legitimate interests (Art. 6 para. 1 lit. f GDPR), which consist in ensuring and improving the integrity, stability, and functionality of the Platform and the FE Services – as far as this is technically possible and reasonable.

Furthermore, for reasons of technical security, in particular, to ward off attempted attacks or other abuse of the Platform, the FE Services and/or our web server, this information is stored for a short period of time. We are not able to directly associate this information with individual persons. After seven days at the latest, this information will be anonymized through the shortening of the IP address to the domain level, so that it will no longer be possible to connect this information to an individual person. However, in the period of time until the shortening of the IP address, we may process this information in case of a security incident (attempted attack or abuse etc.) in cooperation with your Internet provider and/or the local authorities in order to identify the party that caused the security incident. The legal basis for

this is our legitimate interests (Art. 6 para. 1 lit. f GDPR) which consist in protecting the integrity of the Platform, the FE Services, our system and of our users.

This information will only be processed for statistical, market research and/or advertising purposes in anonymized form, i.e. after the IP address has been shortened to the domain level.

3.2 Personal data that you provide in the context of your use of the FE Services on the Platform

- (a) Furthermore, we collect personal data that you have voluntarily provided to us, in order to provide, operate, and administer the Platform in accordance with our Terms of Use (available at <https://world.franka.de/terms>) and to provide the FE Services to you on the Platform.

Thus, we collect in particular (i) the name of your company and your value added tax identification number (VAT-ID) and, if applicable, your customer number and your name, your email address and the language selected by you as well as – optionally – form of address (gender), your title and/or your profile picture if you are registering an account on the Platform and name yourself the contact for the account (hereinafter "**Account Contact**"); (ii) your name, your email address and the language chosen by you as well as – optionally – form of address (gender), your title, and/or profile picture if you join an existing account as a person authorized to use the account (hereinafter "**Account User**") and/or are added to the account by the Account Contact in order to act on behalf of the account; (iii) in addition, your billing address, your delivery address (if it deviates from the billing address), your bank and payment information and your order history if you are ordering a product via the "STORE" area of the Platform; and (iv) in addition, your bank information and sales history if, as a user of the Platform, you yourself are offering products via the "STORE" area of the Platform as a seller (hereinafter "**Third-party Seller**"). Furthermore, we collect your name, your email address and, if applicable, additional information provided by you if you send us a request by email. When we collect your personal data, we will inform you whether the provision of the respective personal data is mandatory or merely optional as well as of the potential consequences of a refusal to provide the respective data.

We generally process your personal data in order to provide, operate and administer the Platform in accordance with our Terms of Use (available at <https://world.franka.de/terms>) and to provide the FE Services to you on the Platform, in particular, to process and coordinate orders and to allow you to conclude contracts with FE and/or Third-party Sellers in the "STORE" area of the Platform and for other requests on the Platform. The legal basis for this is the performance of our contractual duties (Art. 6 para. 1 lit. b GDPR).

- (b) If you have provided your consent, we also collect your form of address (gender), your name, your email address and the language selected by you when registering for our newsletter. We process this personal data in order to send you our newsletter. The legal basis for this is the consent provided by you (Art. 6 para. 1 lit. a GDPR).

We use the newsletter delivery platform MailChimp for sending our newsletters. More information on MailChimp is available in section 4.2.

We use the so-called double opt-in procedure for the registration of our newsletter, i.e. once you have registered for the newsletter, we will first of all send you an email that includes a confirmation link. Only once you have clicked on the confirmation link and we have received the confirmation, will we activate the delivery of the newsletter.

You may withdraw your consent at any time with future effect. You can declare such a withdrawal of consent at any time by following our withdrawal instructions that are

included in each newsletter or by sending your withdrawal request to the contact specified in section 1.2.

4 DISCLOSURE OF PERSONAL DATA

4.1 General information

We do not disclose any personal data to third parties unless such disclosure is required for contractual performance or otherwise allowed by applicable statutory provisions or unless you have given us your consent.

Thus, in order to provide the FE Services, we must disclose certain information for processing product orders and for the associated contract conclusion to other Platform users involved (i.e., if applicable, the Third-party Seller providing the respective product and/or the customer buying the respective product) and to integrated service providers (i.e. payment service providers in case of contract conclusions with Third-party Sellers). The respective information is disclosed to these persons exclusively for the purpose of processing the FE Services on the Platform in connection with the order made for the purchase of the product, but never for marketing purposes. The legal basis for this is the performance of our contractual duties (Art. 6 para. 1 lit. b GDPR).

Furthermore, we are entitled to outsource the processing of personal data in the context of data protection law provisions fully or partially to external service providers working on our behalf as data processors (Art. 4(8) GDPR). If these service providers are domiciled outside the European Union (EU) or the signatory states of the Agreement on the European Economic Area (EEA), we will take appropriate security measures in accordance with the provisions of the applicable laws and the supervisory authorities in order to ensure the security of your personal data.

A list of these external service providers including descriptions of their respective services and of the appropriate data protection level provided is presented in the following table:

| Service provider and, if applicable, name of the service | Description of the service | Measures for ensuring the existence of an appropriate level of protection |
|--|---|--|
| Mindcurv GmbH, Alfredstrasse 66, 45130 Essen, Germany, phone: +49 208 409 599- 0, email: impressum@mindcurv.com | Development, administration and support of the Platform and the FE Services | EU |
| AWS, Amazon Web Services Inc., 410 Terry Avenue North, Seattle, WA 98109, United States of America, phone: +1 206 266 1000, email: privacyshield@amazon.com | Hosting of the Platform and hosting, support, and administration of the server systems | USA EU-US Privacy Shield certification (https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active) |

| | | |
|---|--|---|
| <p>MailChimp, Rocket Science Group LLC, 675 Ponce De Leon Ave. NE #5000, Atlanta, GA 30308, United States of America, phone: +1 404 806 5843, email: dpo@mailchimp.com</p> | <p>Newsletter service for the administration, delivery, and evaluation of our newsletter (cf. also section 4.2)</p> | <p>United States of America</p> <p>EU-US Privacy Shield certification (https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active)</p> |
| <p>all4cloud GmbH & Co. KG, Werner-Heisenberg-Strasse 6a, 68519 Viernheim, phone: +49 6204 91492-00, email: info@all4cloud.de</p> | <p>Provision, advice, administration, support and development of our ERP system for purposes of accounting, merchandising management and controlling</p> | <p>EU</p> |

4.2 Use of the newsletter delivery service provider MailChimp

For the delivery of our newsletter, we use the newsletter delivery platform MailChimp of the US provider Rocket Science Group LLC, 675 Ponce De Leon Ave. NE #5000, Atlanta, GA 30308, United States of America, which works as a data processor (Art. 4 no.8 GDPR) on behalf of FE. MailChimp is a certified participant in the EU-US data protection agreement Privacy Shield (as can be seen at <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG>), so that the statutory requirements for the handling of personal data in accordance with data protection provisions are met.

If you have signed up for our newsletter, your form of address (gender), your name, your email address and the language chosen by you will be stored on the servers of MailChimp in the United States of America in the context of the use of the newsletter delivery platform. MailChimp processes and uses this personal data on our behalf for the delivery and evaluation of our newsletter. Furthermore, MailChimp processes this personal data in order to optimize and improve its newsletter delivery platform.

To this end, the newsletters are provided with a so-called tracking pixel from MailChimp. Said tracking pixel is a pixel-sized file that is accessed by the MailChimp server when our newsletter is opened and via which the technical browser and system information (including your IP address) is collected in order to make technical improvements to the newsletter delivery platform. Furthermore, information is collected on whether and when you have opened the newsletter and which links in the newsletter you clicked on. This serves the purpose of evaluating the reading habits of our newsletter recipients in general in order to allow us to customize and optimize our content accordingly.

Please note: If you use the link in the newsletter to access the newsletter online, e.g. for having it properly displayed, you will reach the MailChimp website. In this context, we would like to point out that the MailChimp website might use cookies, tracing pixels, or other technologies beyond our control. Further information is included in the MailChimp Privacy Policy at <https://mailchimp.com/legal/privacy>.

In addition to your consent (cf. in this regard section 3.2 lit. b and section 8 lit. f, the legitimate interests of FE and MailChimp (Art. 6 para. 1 lit. f GDPR) form the legal basis for the use of

MailChimp. Said legitimate interests consists in our goal to provide a user-friendly newsletter system to you that meets your expectations and needs and serves our business interests.

If you do not consent to the delivery of the newsletter by MailChimp or the statistical evaluation of the newsletter by MailChimp, you can only withdraw your consent to the receipt of our newsletter in its entirety (cf. section 3.2 lit. b). Unfortunately, the withdrawal of individual components is not possible.

5 SECURITY

We take appropriate and reasonable technical measures to secure your personal data from loss, destruction, manipulation and unauthorized access. In order to protect the transmission of data, the Platform uses transport encryption (TLS). Downloadable files and data "at rest" are cryptographically secured. All our employees and external service providers working on our behalf (data processors within the scope of Art. 4 no. 8 GDPR) are subjected to the obligation to comply with the applicable data protection laws.

Our security measures are subject to an ongoing improvement and optimization process. Please always use the latest browser version in order to ensure that your personal data is protected in the best way possible.

6 STORAGE PERIOD

We will only store your personal data for as long as its storage is required for the achievement of the purposes for which it was collected or for the duration of the statutory retention periods, if the law dictates longer retention periods (e.g. Sec. 147 AO [German Fiscal Code] and Sec. 257 HGB [German Commercial Code]). Afterwards, your personal data will be deleted.

7 WEB ANALYTICS, COOKIES, LOCAL STORAGE, AND PLUG-INS

7.1 We use cookies and local storage on the Platform and in the context of the FE Services in order (a) to provide and maintain, as far as technically possible and reasonable, a stable, secure, functioning, and flawlessly running platform; and (b) to allow and to provide to you an optimal and meaningful user experience.

Cookies and local storage help us to make your visit to the Platform and your use of the FE Services more comfortable, efficient, and meaningful.

(a) Cookies

Cookies are text information files that our web server sends to and places on your computer when you are visiting the Platform. Most browsers accept cookies automatically but can be configured to not allow the use of cookies via the browser settings. You may refuse the use of cookies or delete the data collected in this context at a later point in time. You do not need to allow the use of cookies to be able to use the Platform in general.

Instructions for how to delete cookies in the most common browsers are provided in the following table:

| Browser | Instructions for deleting cookies |
|-----------------------------|---|
| Microsoft Internet Explorer | https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies |

| | |
|-----------------|---|
| Mozilla Firefox | https://support.mozilla.com/de/kb/cookies-loeschen-daten-von-websites-entfernen?redirectlocale=de&redirectslug=Cookies+!%C3%B6schen |
| Google Chrome | https://support.google.com/chrome/answer/95647?hl=de |
| Apple Safari | https://support.apple.com/?path=Safari/3.0/de/11471.html |
| Opera | http://help.opera.com/Windows/9.10/de/cookies.html |

(b) Local storage

The local storage technology is further described in section 7.2 lit. a. For the reasons explained in said section, the use of local storage cannot be disabled since it is necessary for authentication and security purposes in connection with your account.

7.2 The following types of cookies and local storage are used on the Platform:

(a) Local storage

Local storage is a technology that your browser uses to store data on your computer or your mobile device, in order to recognize repeated use by the same user; for this purpose, the collected data remain stored after the browser has been closed or the program has been ended. Thus, it is recorded via local storage whether you are logged into the Platform. This serves authentication and security purposes and is necessary in order to enable you to navigate and use the Platform when you are logged in (association with your account and/or your Account User access). The legal basis for this is the performance of our contractual duties (Art. 6 para. 1 lit. b GDPR).

(b) Integration of YouTube

The Platform includes embedded videos of the social network (YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, United States of America). The integration of YouTube videos into our Platform takes place exclusively in the so-called "privacy-enhanced mode". Said mode is provided by YouTube itself; YouTube declares in this context that it will not place any cookies on your device unless you click on the YouTube video to play it. In this case, YouTube might store cookies (cf. section 7.1 lit. a) on your device and obtain web server protocol information (cf. section 3.1) from you. If you are logged into YouTube or another Google service (e.g. Google+), this information might be associated with your respective user account. The use of these cookies can be prevented e.g. by means of the corresponding browser settings (cf. section 7.1 lit. a).

Further information on the handling of user data is available in YouTube's Privacy Policy at <https://www.google.de/intl/de/policies/privacy>. YouTube LLC has a EU-US Privacy Shield certification (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

The legal basis for the integration of YouTube is our legitimate interests (Art. 6 para. 1 lit. f GDPR) which consist in providing an attractive and user-friendly presentation of our Platform to you.

According to applicable data protection law, you are, in particular, entitled to the following rights. For this purpose, please contact our data protection officer via the contact options specified in section 1.2.

- (a) **Right to information:** You have the right to request at any time information on your personal data stored by us. You can also view the master data of your account and Account User access directly in your account and Account User access.
- (b) **Right to rectification:** When processing your personal data, we attempt to ensure through appropriate measures that your personal data is correct and up to date for the purposes for which it has been collected. If your personal data is incorrect or incomplete, you may request the rectification of the respective data. You can also correct the master data of your account and Account User access directly in your account and/or Account User access.
- (c) **Right to erasure and restriction of processing:** You may have the right to request the erasure and/or a restriction of processing of your personal data, e.g. if, according to this Privacy Policy or applicable law, a legitimate business purpose for such processing does no longer exist and if statutory retention obligations do not require a continued storage.
- (d) **Right to data portability:** You may have the right to receive the respective personal data you provided to us in a structured, commonly used, and machine-readable format or to transmit those data to another controller.

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| (e) Right to object: You may have the right to object, on grounds relating to your particular situation, to the processing of your personal data. |
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- (f) **Right to withdraw your consent:** If you have given consent to the collection and processing of your personal data, you may withdraw your consent at any time with effect for the future; however, the lawfulness of the processing performed based on the consent until its withdrawal shall not be affected by such a withdrawal. In addition, you have the option to object to the use of your personal data for market and opinion research and advertising purposes. Further information on the withdrawal of your consent to receiving our newsletter is available in section 3.2 lit. b.
- (g) **The competent supervisory authority in case of complaints:** Furthermore, you may contact the Data Protection Authority of Bavaria for the Private Sector (BayLDA), P.O. Box 606, 91522 Ansbach, Germany, phone: +49 981 53-1300, fax: +49 981 5398-1300, email: poststelle@lda-bayern.de as FE's competent supervisory authority in case of complaints. A list of other supervisory authorities that you may consider contacting (e.g. the one competent at your place of business) is available at https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html.

9 LINKS TO OTHER WEBSITES

The Platform may also contain links to other websites. The present Privacy Policy does not apply to these other websites. We ask that you visit these other websites directly in order to obtain information on how these websites protect data and handle your personal data.

10 RIGHT TO MAKE CHANGES

We reserve the right to change this Privacy Policy at any time in accordance with the statutory provisions. Changes may, for example, be required for compliance with new statutory provisions, due to new technologies, or in case of new services.