
 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law

1. General

- 1.1 It is an important concern of Innofreight Solutions GmbH ("Innofreight", "we", "our") to provide adequate protection for your personal data. In this data privacy notice, we inform you about the manner, scope and purpose of the collection and use of your personal data in connection with your visit to our website www.innofreight.com ("website").
- 1.2 We process your data solely on the basis of the statutory provisions regarding data privacy and data security, in particular the Austrian Data Protection Act ("DSG"), the EU General Data Protection Regulation ("GDPR") and the Telecommunications Act ("TKG").

2. Contact:

- 2.1 The controller pursuant to the General Data Protection Regulation and other provisions under data privacy law is

Innofreight Solutions GmbH
Grazer Straße 18
8600 Bruck an der Mur
Austria
Tel.: +43 3862 8989-242

3. Personal data

- 3.1 Pursuant to Art. 4 Clause 1 GDPR, personal data are all information that refers to an identified or identifiable natural person.
- 3.2 A natural person is deemed to be identifiable who can be identified directly or indirectly, in particular by classification to an identifier such as a name, a code number, location data, online identifier or to one or several special features which are an expression of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

4. Data collected



- 4.1 In the course of your visit to the website, the following data which are described in more detail in the following will be collected: server log files, cookies, information that you yourself provide by sending the contact form or completing the application form and data that are processed by third parties (e.g. Google, Facebook).
- 4.2 You are not obligated by law or contract to provide us with your personal data. However, it is possible that certain functions of our webpages depend on the provision of personal data. If you do not provide us with personal data in these cases, this can result in functions of the website not being available or only being available to a limited extent.

5. Purpose of the processing

- 5.1 We will process your personal details for the following purposes:
 - in order to make the website available to you and to further improve and develop this website
 - in order to be able to create usage statistics
 - in order to be able to recognise, prevent and analyse attacks against our website
 - in order to answer your enquiries (contact form, letter of application)
 - in order to be able to present information to you in the best possible way (e.g. through YouTube videos, Instagram)

6. Server log files

- 6.1 So that the stability and security of the website is guaranteed, the following data are automatically (server log files) collected when the website is viewed (pursuant to Art. 6 Par. 1 Letter f GDPR):
 - IP address
 - Date and time of the request
 - Content of the request
 - The webpage visited previously and subsequently (referrer URL)
 - Operating system and Internet service provider

 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law



- Access status

7. Cookies

- 7.1 Our website uses so-called cookies. These are small text files that are installed on your terminal with the aid of the browser.
- 7.2 Cookies are used to make the services offered more user-friendly. Certain cookies remain on your terminal until you delete them (so-called "persistent cookies"). They make it possible for us to recognise your browser when you visit our website again. In contrast, so-called "session cookies" are deleted automatically after the end of your browser session.
- 7.3 The cookies used by Innofreight can be classified in 3 categories:
- 7.3.1 **Necessary cookies**
These cookies are absolutely necessary to facilitate error-free usage of the website and of certain functions of the website (e.g. login/shopping cart).
- 7.3.2 **Analysis cookies**
These cookies collect information about the behaviour of the users on the website; in this way, the website can be improved in a targeted way (e.g. browser types, loading times, error messages).
- 7.4 When you visit the website for the first time, you can decide whether you wish to accept all cookies or carry out individual settings. The cookie settings can be adjusted subsequently at any time.
- 7.5 If you do not wish this, you can set your browser up so that it informs you about the setting of cookies and you only permit this in individual cases. If you require further information with regard to this function, please use the "help function" of your browser.
- 7.6 Cookies cannot execute any programs or transmit viruses to your computer. Nor can they access any other data on your computer or read or change them.
- 7.7 The legal basis for the use of necessary cookies is Art. 6 Para. 1 Letter f GDPR and for performance and function cookies Art. 6 Para. 1 Letter b GDPR.

8. Application

- 8.1 In the course of your application, we collect the following personal application data from you that we save and process:
- General data about your person (e.g. name, residential address, contact information)
 - Application documents (e.g. letter of application plus attachments)
 - Curriculum vitae and the data contained therein
 - Information about the position that you have applied for (e.g. position, place of work, salary, required skills and experiences)
 - Information about your previous work experience and employment (e.g. company, position, date of entry)
 - Information about your professional and vocational training,
- referred to as "data" in the following point 8.
- 8.2 We collect these data within the framework of the application process either because you yourself provide them to us (for instance, by sending us your curriculum vitae) or because we collect them ourselves (for instance, by recording notes during the interview). For the rest, we can process job-related information that you have made publicly available, for instance a profile on professional social media networks
- 8.3 We process your personal data for the purpose of your application for a position at Innofreight or a company affiliated with Innofreight if this is necessary for the decision regarding the establishment of an employment relationship pursuant to Art. 6 Par. 1 Letter b GDPR.
- 8.4 If an employment contract is subsequently concluded between you and Innofreight, we can process the personal data already received further for purposes of the employment contract.
- 8.5 Your data are saved electronically or stored in paper form by Innofreight. In the event of an interview, parts of your answers are documented and stored in digital and/or paper form.
- 8.6 After completion of the application procedure, your data will be fundamentally retained for seven months and then deleted. This does not apply if statutory provisions conflict with a deletion or further storage is required for evidence purposes. If you do not want your data to be saved after completion of the application procedure, please briefly notify us of this: hr@innofreight.com.
- 8.7 Your data will only be forwarded to the in-house departments responsible for the specific application

 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law

procedure.

9. Contact & Business relationship

- 9.1 If you contact us (e.g. by e-mail), the personal data transmitted will be saved.
- 9.2 The legal basis for the processing of data that is transmitted is Art. 6 Par. 1 Letter f GDPR.
- 9.3 Within the framework of the business relationship with our customers, suppliers and other business partners it is necessary to collect personal data both in the initiation of the contract and in the ongoing cooperation. The legal basis for this is Art. 6 Par. 1 Letter b GDPR.

10. Google Analytics



- 10.1 This website uses Google Analytics, a web analysis service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA ("Google"). Google Analytics uses cookies that are saved on your computer. We process your data on the basis of our legitimate interest in being able to create easy-to-use website access statistics (Art. 6 Par. 1 Letter f GDPR). The information generated by the cookie regarding your usage of this website (including your IP address and pseudonymised ID and the URLs of the retrieved websites) are transferred to servers of Google in the US and saved there. This website uses the option offered by Google Analytics of IP anonymisation. Your IP address will be shortened by Google within Member States of the European Union or in other signatory states to the Convention on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a server belonging to Google in the US and saved there.
- 10.2 Google will use this information on our behalf in order to analyse your usage of the website, to compile reports on the website activities and to provide further services associated with the usage of the Internet and website to us.
- 10.3 You can also prevent Google from collecting your data in connection with Google Analytics by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>
- 10.4 Further information on the terms and conditions of usage of Google and Google's data privacy notice can be found at <http://www.google.com/analytics/terms/de.html>, <https://policies.google.com/privacy/partners?hl=de> or at <https://www.google.at/intl/at/policies/>.
- 10.5 The legal basis for the processing of data is § 96 para 3 TKG.

11. YouTube

- 11.1 Our website uses plug-ins of the website YouTube. The operator of the pages is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. We use YouTube in enhanced data privacy mode. According to YouTube, this mode means that YouTube does not save any information about the visitors on this website until they have seen the video. However, the transfer of data to YouTube partners is not necessarily excluded by the enhanced data privacy mode. For instance, irrespective of whether you watch a video, YouTube establishes a link to the Google DoubleClick network. As soon as you start a YouTube video on our website, a connection is established to the YouTube servers. In the process, the YouTube server is informed which of our pages you have visited. If you are logged in to your YouTube account, you make it possible for YouTube to directly assign your surfing behaviour to your personal profile. You can prevent this by logging out of your YouTube account.
- 11.2 In addition, YouTube can save various cookies on your terminal after a video has started. With the aid of these cookies, YouTube can obtain information about visitors to our website. This information is used, among other things, to record video statistics, to improve user friendliness and to prevent attempts at fraud. The cookies remain on your terminal until you delete them.
- 11.3 After starting a YouTube video, further data processing procedures may be initiated over which we do not have any influence.
- 11.4 The usage of YouTube is done in the interest of presenting our services in an appealing way. This constitutes a legitimate interest pursuant to Art. 6 Par. 1 Letter f GDPR.
- 11.5 Further information on data privacy at YouTube can be found in their data privacy notice at: http://www.youtube.com/t/privacy_at_youtube.

12. Social media plug-ins

- 12.1 Plug-ins of social media (e.g. Facebook, YouTube, Instagram, LinkedIn) are used on our pages.

 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law

- 12.2 You can usually recognise the plug-ins by the respective social media logos. In order to guarantee the data privacy on our website, we only use these plug-ins in connection with the so-called "Shariff" solution. This application prevents plug-ins integrated on our website already transmitting data to the respective provider when the page is accessed for the first time.
- 12.3 Only when you activate the respective plug-in by clicking on the respective icon will a direct connection to the server of the provider be established (consent pursuant to Art. 6 Par. 1 Letter a GDPR). As soon as you activate the plug-in, the respective provider will receive the information that you have visited our site with your IP address. If you are logged into your respective social media account (e.g. Facebook) at the same time, the respective provider can assign the visit to our pages to your user account.
- 12.4 The activation of the plug-in constitutes consent pursuant to Art. 6 Par. 1 Letter a GDPR. You can revoke this consent at any time with effect for the future.
- 12.5 In addition, we have a legitimate interest in the greatest possible visibility in social media. This constitutes a legitimate interest withing the meaning of Art. 6 Par. 1 Letter f GDPR.
- 12.6 The following plugins are used on our website:

12.6.1 Facebook

Plug-ins of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated on our pages. You can recognise the Facebook plug-ins by the Facebook logo or the "Like" button on our page. An overview of the Facebook plug-ins can be found here: <http://developers.facebook.com/docs/plugins/> When you visit our pages, a direct connection is established between your browser and the Facebook server via the plug-in. Facebook thus obtains information that you have visited our site with your IP address. If you click on the Facebook "Like" button whilst you are logged in to your Facebook account, you can link the content of our pages on your Facebook profile. Facebook can thus assign the visit to our pages to your user account. We point out that as the provider of the pages we do not have any knowledge of the content of the data transmitted or their usage by Facebook. Further information on this can be found in the data privacy notice of Facebook at <https://de-de.facebook.com/policy.php>. If you do not want Facebook to be able to assign your visit to our pages to your Facebook user account, please log out of your Facebook user account.

12.6.2 Instagram



Functions of the Instagram service are integrated on our pages. These functions are offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. If you are logged into your Instagram account, you can link the content of our pages with your Instagram profile by clicking on the Instagram button. Instagram can thus assign the visit to our pages to your user account. We point out that as the provider of the pages we do not have any knowledge of the content of the data transmitted or their usage by Instagram. Further information on this can be found in the data privacy notice of Instagram: <https://instagram.com/about/legal/privacy/>.

12.6.3 LinkedIn

Our website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Every time one of our pages that contains functions of LinkedIn is called up a connection is established to servers of LinkedIn. LinkedIn is informed that you have visited our webpages with your IP address. If you click on the "Recommend" button of LinkedIn and are logged into your account at LinkedIn, it is possible for LinkedIn to assign your visit to our webpage to you and your user account. We point out that as the provider of the pages we do not have any knowledge of the content of the data transmitted or their usage by LinkedIn. The use of the LinkedIn plug-in is done on the basis of Art. 6 Par. 1 Letter f GDPR. Innofreight has a legitimate interest in being visible on social media as much as possible. Further information in this regard can be found in the data privacy notice of LinkedIn at: <https://www.linkedin.com/legal/privacy-policy>.

13. Legal basis

- 13.1 When we obtain consent from the data subject for processing procedures of personal data, Art. 6 Para. 1 Letter a GDPR serves as a legal basis.
- 13.2 In the processing of personal data that are required for the **fulfilment of a contract** whose contractual party is the data subject, Art. 6 Para. 1 Letter b GDPR serves as a legal basis. This also applies for processing procedures that are required to carry out pre-contractual measures.
- 13.3 If a processing of personal data is required to **fulfil a legal obligation** which our company is subject to, Art. 6 Para. 1 Letter c GDPR serves as a legal basis.
- 13.4 If the processing is necessary to **safeguard a legitimate interest** of our company or a third party and if the interests, fundamental rights and fundamental freedoms of the data subject do not outweigh the first-

 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law

mentioned interest, Art. 6 Para. 1 Letter f GDPR serves as the legal basis for the processing.

- 13.5 The Directive 2009/136/EC ("Cookie Directive") was implemented by Section 96 Par. 3 of the Telecommunications Act and regulates the permissibility of cookies.
- 13.6 No consent from the user is required for "necessary cookies", due to the exemption clause in Section 96 Par. 3 of the Telecommunications Act (TKG).
- 13.7 Voluntary consent from the user is required for other cookies. This will be granted during the first-time visit to the website by actively clicking (placing a cross) in the cookie banner.

14. Duration of storage and data deletion

- 14.1 We only save your personal data for as long as we require them to fulfil the aforementioned purposes and our contractual and/or statutory obligations. When we no longer require your personal data, we delete them from our systems and records or anonymise them so that you can no longer be identified.
- 14.2 Pursuant to the laws, regulations or other legal provisions, it may be necessary to save the personal data for a duration beyond the aforementioned period of time.

15. Transmission to third parties



- 15.1 We can transmit your personal data to companies affiliated with us within the InnoFreight Group if this is permissible within the framework of the purposes shown above and the associated legal bases because you can also work for these companies within the framework of the order process or an employment relationship. These are in particular the following companies:
Innofreight Austria GmbH, Grazer Straße 18, 8600 Bruck an der Mur, Austria
Innofreight Germany GmbH, Lobensteiner Straße 5, 07929 Saalburg-Ebersdorf, Germany
Innofreight Czech s.r.o., AZ TOWER, Pražákova 1008/69, 639 00 Brno, Czech Republic
Innofreight Scandinavia AB, Box 23, Malmgatan 22, 941 31 Piteå, Sweden
- 15.2 Even if you are located in the European Union, personal data that are collected during usage of this website may be processed in a country in which the adequacy of the data privacy laws of these countries has not been approved by an adequacy decision of the European Commission.
- 15.3 In the course of using Google Analytics or social media plugins, it is possible that personal data may be transmitted to the USA. Since these electronic communication services are qualified under 50 U.S. Code § 1881 (b) (4), they are subject to monitoring by U.S. intelligence agencies pursuant to 50 U.S. Code § 1881a ("FISA 702"). We therefore expressly draw your attention to the fact that the transfer of personal data to the USA does not guarantee compliance with European data protection. The legal basis for the transfer of personal data to the USA is the exceptional provision of Art 49 Par. 1 Letter a GDPR. You therefore give us your express consent here, after you have been informed about the risks.

16. Security of the data

- 16.1 In order to guarantee the security and confidentiality of the personal data captured by us on the websites and apps, we use data networks that are protected, amongst other things, by firewalls and password systems that are usual in the industry. When handling your personal data, we take appropriate technical and organisational measures in order to protect your data against loss, misuse, unauthorised access, disclosure, amendment or destruction, and to guarantee availability.
- 16.2 If you want to send us personal data in electronic form by entering them on our website, your data will be transmitted over the Internet to our web server via a secure connection (SSL) corresponding to the state of the art in encrypted form and saved and backed up. Please note, however, that the sending of data by e-mail is fundamentally not done in encrypted form.
- 16.3 Data security for the transmission of data within the Internet according to the current state of the art cannot be universally guaranteed. Other users may be technically able to intervene in the network security without authorisation and to control the communication traffic. Please remember this when you contact us.

17. Your rights

- 17.1 With regard to your personal data, you have the following rights:
 - **Right of access by the data subject** pursuant to Art. 15 GDPR
 - **Right to rectification** pursuant to Art. 16 GDPR
 - **Right to erasure** pursuant to Art. 17 GDPR
 - **Right to restriction of processing** pursuant to Art. 18 GDPR

 innofreight	DATA PRIVACY NOTICE	 innofreight
REV_00	F_353	Law

- **Right to data portability** pursuant to Art. 20 GDPR
- **Right to object** pursuant to Art. 21 GDPR

17.2 You also have a **right to revocation** with regard to your consent to the processing of personal data, which you can make use of at any time.

17.3 You also have the **right to appeal** to a supervisory authority.