

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

Mandatory information on data use in accordance with the General Data Protection Regulation (GDPR) pursuant to Articles 13 and 14 GDPR, for informational purposes only:

August 2025

1. General

- 1.1 It is an important concern of Innofreight ("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 or any websites and web services available under the domain or associated subdomains (e.g. os.innofreight.com) (hereinafter referred to as the "website"), your cooperation with Innofreight as well as visiting Innofreight's events.
- 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 2021 ("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 11

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 considered identifiable if they can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification 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 or data we collect in connection with events 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 website 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. Server log files

5.1 Description and scope of data processing

The following data are automatically collected when the website is viewed:

- 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
- Access status

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

In the following called "server log files".

5.2 Purpose of the data processing

Server log files are collected to ensure the stability and security of the website, to prevent system errors and system malfunctions and to detect and prevent unauthorized access to the website.

5.3 Legal basis of data processing

The storage of server log files is based on our legitimate interest in the secure provision of our website in accordance with Art. 6 Para. 1 Letter f GDPR.

6. Cookies

6.1 Description and scope of data processing

Our website uses so-called cookies. These are small text files that are installed on your terminal with the aid of the browser.

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.

6.2 The cookies used by Innofreight can be classified in 3 categories:

6.2.1 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).

6.2.2 Function cookies

These cookies are not absolutely necessary but increase the user-friendliness of our website (e.g. language settings).

6.2.3 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).

6.3 Purpose of the data processing

Data processing by means of cookies is used for range and usage measurement, recognition of visitors to our website and user-friendly presentation of our website.

6.4 Legal basis of data processing

When you visit the website for the first time, you can decide whether you wish to accept all cookies or carry out individual settings ("cookie banner"). The cookie settings can be adjusted subsequently at any time.

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.

The legal basis for the use of necessary cookies is the exception provision of § 165 Para. 3 TKG.

For function- and analysis cookies, voluntary consent is required in accordance with § 165 Para. 3 TKG in conjunction with Art. 6 Para. 1 Letter a GDPR by means of the cookie banner.

7. Google Analytics

7.1 This website uses Google Analytics, a web analysis service of Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland or Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA ("Google"). Google Analytics uses cookies that are saved on your computer. The information generated by the cookie regarding your usage of this website (including your anonymised IP address and pseudonymised ID and the URLs of the retrieved websites) are transferred to servers of Google in the USA 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 USA and saved there.

7.2 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.

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

- 7.3 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>
- 7.4 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/>.
- 7.5 The legal basis for the processing of data is § 165 Para. 3 TKG.

8. Matomo Analytics

- 8.1 Our website uses the open-source software tool Matomo, a web analytics service provided by InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand ("Matomo"). We use the self-hosted version of Matomo. This means that your data is not shared with third parties, as the software is operated directly on our own web server.
- 8.2 When you visit our websites, Matomo cookies are stored on your device, enabling analysis of your use of the website. These cookies are used to recognise returning users, statistically evaluate the use of the website and derive improvements from this.
- When you visit our website, Matomo saves the following data:
- the user's IP address (anonymized)
 - the subpage accessed and the time of access
 - the page from which the user accessed our website (referrer)
 - which browser with which plugins, which operating system and which screen resolution is used
 - the length of time spent on the website
 - the pages that are accessed from the subpage that has been called up
- 8.3 We have configured Matomo in such a way that your IP address is only recorded in shortened form, so that it is not possible to draw conclusions about your person. It will not be merged with other personal data. The analysis is completely anonymized.
- 8.4 The information generated by the cookies and anonymization about your use of this website is saved exclusively on our server and is not passed on to third parties.
- 8.5 The data is processed on the basis of your consent in accordance with Art. 6 Para. 1 Litera a GDPR. You give this consent via our cookie banner when you first visit the website. Your consent is voluntary and can be revoked at any time with effect for the future.
- 8.6 The cookies are saved for 30 minutes to 13 months, depending on the type.
- 8.7 Further information on the terms and conditions of usage of Matomo und Matomo's data privacy notice can be found at: <https://matomo.org/privacy/>.

9. Social media plug-ins

- 9.1 Social media plug-ins (Facebook, YouTube, Instagram, LinkedIn) are used on our website.
- 9.2 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.
- 9.3 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 Para. 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.
- 9.4 The activation of the plug-in constitutes consent pursuant to Art. 6 Para. 1 Letter a GDPR. You can revoke this consent at any time with effect for the future.
- 9.5 In addition, we have a legitimate interest in the greatest possible visibility in social media. This constitutes a legitimate interest with the meaning of Art. 6 Para. 1 Letter f GDPR.
- 9.6 The following plugins are used on our website:
- 9.6.1 **Products of Meta (Facebook, Instagram)**
Our website integrates plugins from the social network Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland (Facebook and Instagram).

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

Facebook

You can recognise the Facebook plug-ins by the Facebook logo on our website. 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 website 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 website we do not have any knowledge of the content of the data transmitted or their usage by Facebook. Further information 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.

Instagram

Functions of the Instagram service are integrated on our website. 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 website 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 website 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/>.

9.6.2 LinkedIn

Our website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Every time you visit our website, which contains LinkedIn features, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our websites 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. Further information can be found in the data privacy notice of LinkedIn at: <https://www.linkedin.com/legal/privacy-policy>.

9.6.3 Youtube

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.

In addition, YouTube can save various cookies on your terminal device 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 device until you delete them.


After starting a YouTube video, further data processing procedures may be initiated over which we do not have any influence.

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 Para. 1 Letter f GDPR. Further information on data privacy at YouTube can be found in their data privacy notice at: http://www.youtube.com/t/privacy_at_youtube.

10. Application

10.1 Description and scope of data processing

In the course of your application, we collect the following personal application data from you that we save and process:

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

- 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.

- 10.2 If you apply online via our website, you can use the applicant management system provided by BMD Systemhaus GesmbH. To complete your application, you can upload your applicant data and documents yourself and a corresponding application profile will be created in the BMD applicant system.
- 10.3 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). Furthermore, we can process job-related information that you have made publicly available, for instance a profile on professional social media networks
- 10.4 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.
- 10.5 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.
- 10.6 After completion of the application procedure (acceptance, rejection or withdrawal of application), 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.
- 10.7 Your data will only be forwarded to the in-house departments responsible for the specific application procedure.
- 10.8 Purpose of the data processing
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.
- 10.9 Legal basis of data processing
The legal basis for data processing is the employment contract with you (employment contract) or the corresponding pre-contractual relationship (Art. 6 Para. 1 Letter b GDPR) as well as the protection of our legitimate interests in processing the application procedure and managing your applicant data (Art. 6 Para. 1 Letter f GDPR).
- 10.10 Application to affiliated companies of the Innofreight-Group
Innofreight supports the following affiliated companies in all aspects of applicant management when you apply for a position at one of these companies via the Innofreight website:
- Innofreight Consulting & Logistics GmbH
 - Innofreight Austria GmbH
 - Innofreight Czech s.r.o.
 - Innofreight Germany GmbH
 - Innofreight International GmbH
 - Innofreight Scandinavia AB
 - Innofreight Swiss GmbH
 - Innofreight Rail Operations GmbH
 - Innofreight Transportlogistik GmbH
 - Innofreight IT Solutions GmbH
 - Inno4wood GmbH
 - InnoWaggon GmbH
 - Innofreight Speditions GmbH

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

In this case, Innofreight and the respective affiliated company are joint controllers within the meaning of Art. 26 GDPR. The purpose of this joint responsibility is to fill open jobs at the respective affiliated company of Innofreight through coordinated application management and to administer the applications.

11. Contact & Business relationship

11.1 Description and scope of data processing

If you contact us (e.g. by e-mail), the personal data transmitted will be saved.

11.2 Purpose of data processing

In order to respond to your requests, it is necessary to process the personal data provided by you.

11.3 Legal basis of data processing

The legal basis for the processing of data is our legitimate interest in responding to your request pursuant to Art. 6 Para. 1 Letter f GDPR.

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 Para. 1 Letter b GDPR.

12. Events

12.1 Description and scope of data processing

In the context of events organised by Innofreight, personal data are processed for specific purposes.

The following personal data will be processed by Innofreight:

- Title, form of address, first and last name
- Birth dates
- Telephone number, e-mail address
- Photographs and video recordings (including sound).
- Company affiliation
- ID data (passport details/ID card details)

12.2 Purpose and legal basis of data processing

The purpose of this processing is the organisation and execution of the respective event.

Personal data of visitors to the respective event are processed for the purpose of sending invitations to them, general event management and the administration of participation in events. Furthermore ID details are collected for the purpose of hotel booking and to comply with factory security regulations (factory access during tours). Without this information, we cannot register you for the selected event.

12.3 Legal basis of data processing

The legal basis for the processing of personal data is pre-contractual or contractual measures in accordance with Art. 6 Para. 1 Letter b GDPR. Data processing is carried out for the purpose of processing your registration and conducting the event.


Furthermore, Innofreight has a legitimate interest in organising and executing the respective event. Data processing is based on Art. 6 Para. 1 Letter f GDPR.

During the event, photos and video recordings of the whole event will be taken in order to document the event and to represent Innofreight externally. Photographs and video recordings of the event will be made available and published in various media such as the internet/website, social media (Facebook, Instagram, YouTube, LinkedIn), newsletters, brochures and print media (regional newspapers such as "Obersteirische Rundschau" and trade journals "Österreichische Verkehrszeitung", "Verkehr", "ITJ – International Transport Journal"). For further information on the social media platforms in terms of data protection law, please refer to point 9 and, with regard to the transfer to third countries, to point 14.4. of this data privacy notice. We have a legitimate interest in our public relations work, press coverage and advertising of our company within the meaning of Art 6 Para. 1 Letter f GDPR.

You have the right to object at any time on grounds arising from your particular situation to the processing of personal data which is carried out on the basis of Art. 6 Para. 1 Letter f GDPR, in accordance with Art. 21 GDPR.

We only store your personal data for as long as we need it to fulfil the respective purposes. As soon as we no longer need your personal data for the purposes described, we will delete it, provided that no further statutory retention periods apply.

You also have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6 Para. 1 Letter f GDPR, in

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

accordance with Article 21 GDPR. An objection will result in us no longer using your data for marketing purposes from that point onwards.

13. Storage period and data deletion

- 13.1 We only store your personal data for as long as we need them to fulfil the purposes outlined above and our contractual or legal obligations. When we no longer need your personal data, we delete it from our systems and records or anonymise it so that you can no longer be identified.

14. Transmission to third parties

- 14.1 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.

These are in particular the following companies:



- Innofreight Consulting & Logistics GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- Innofreight Solutions GmbH
 - Branch Linz: Lunzer Straße 64, 4030 Linz, Austria
 - Branch Celje: Kidričeva ulica 24a, 3000 Celje, Slovenia
- Innofreight Austria GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
 - Branch Celje: Kidričeva ulica 24a, 3000 Celje, Slovenia
- Innofreight Germany GmbH, Lobensteiner Straße 5, 07929 Saalburg-Ebersdorf, Germany
 - Branch Bad Salzungen: Nappenplatz 13, 36433 Bad Salzungen, Germany
 - Branch Krefeld: Hüttenallee 41, 47800 Krefeld, Germany
 - Branch Rosenheim: Oberaustraße 34, 83026 Rosenheim, Germany
- Innofreight Czech s.r.o., Vídeňská 186/118, 619 00 Brno, Czech Republic
- Innofreight Scandinavia AB, Box 23, Malmgatan 22, 941 31 Piteå, Sweden
- Innofreight Swiss GmbH, Länggasse 53, 3360 Herzogenbuchsee, Switzerland
- Innofreight International GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- Innofreight IT Solutions GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- Innofreight Speditions GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- Innofreight Transportlogistik GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
 - Branch Vienna: Neulinggasse 29/1/17b, 1030 Vienna, Austria
- Innofreight Rail Operations GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- InnoWaggon GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria
- Inno4Wood GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Austria

- 14.2 In addition, our IT service providers (Innofreight IT Solutions GmbH) and marketing service providers (Innocube GmbH), who support us in providing our services, have access to personal data. Furthermore, your personal data may be transferred to BMD Systemhaus GesmbH during the application process for the purpose of applicant management by Innofreight. Appropriate data processing agreements have been concluded with these service providers in accordance with Art. 28 GDPR.

- 14.3 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.

- 14.4 In the course of the data processing described above and in particular when using Google Analytics, social media plugins and publishing personal data on the internet (e.g. social media channels), it is possible that personal data from the European Union (EU), the European Economic Area (EEA) and Switzerland may be transferred to the United States of America (USA) and back.

We would like to point out that on 10.06.2023, the European Commission adopted a partial adequacy decision pursuant to Art. 45 GDPR for the United States. This adequacy decision stipulates that the United States ensures an adequate level of protection (comparable to that of the EU) for personal data transferred from the EU to US companies within the new framework. However, this adequacy decision only applies to US companies that have been included in the "Data Privacy Framework List" after self-certification. If a data importer such as "Meta Platforms, Inc." appears on this list, the transfer of personal data is possible on the basis of the adequacy decision alone and no further measures within the meaning of Art. 46 GDPR need to be taken. You can find out which companies have been certified under www.dataprivacyframework.gov. For all US companies that are not covered by the EU-US Data Privacy Framework, there is still a risk that personal data may be subject to access by US authorities for control and surveillance purposes and that

 innofreight	DATA PRIVACY NOTICE	 innofreight
		Legal

you will have no effective legal remedies available. Therefore, we continue to rely on other appropriate safeguards in accordance with Art. 46 GDPR or on exceptions within the meaning of Art. 49 GDPR.

15. Security of the data

- 15.1 In order to guarantee the security and confidentiality of the personal data captured by us on the websites, 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.
- 15.2 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.
- 15.3 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.

16. Your rights

- 16.1 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
 - **Right to data portability** pursuant to Art. 20 GDPR
 - **Right to object** pursuant to Art. 21 GDPR
- 16.2 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. We point out that the legality of the data processing carried out until revocation remains unaffected.
- 16.3 You also have the **right to appeal** to a supervisory authority. In Austria, the data protection authority is responsible:

Austrian Data Protection Authority
Barichgasse 40-42, 1030 Wien, Österreich
Tel.: +43 1 52 152-0, dsb@dsb.gv.at

17. Contact

- 17.1 For questions regarding data protection or exercising your rights, you have the following options:
- **E-Mail address:** datenschutz@innofreight.com
 - **Postal address:** Innofreight Solutions GmbH, Grazer Straße 11, 8600 Bruck an der Mur, Österreich