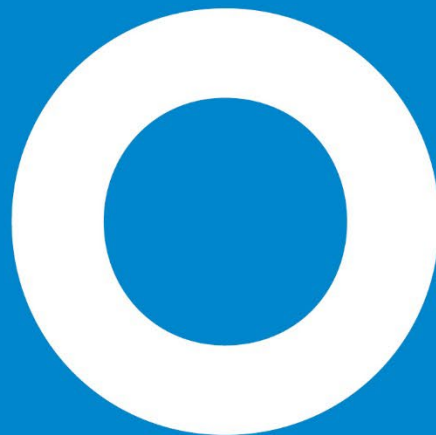


▽value  
one



Länge  
mal Breite  
mal Höhe  
mal Freude.



**Data protection policy  
of Value One**

Our data protection policy aims to ensure the secure and responsible handling of personal data.

The aim of the policy is to provide a common framework for data protection within the Value One Group. Our internal data protection policy ensures the secure and responsible handling of personal data. We aim to ensure that all data processing activities are conducted in a lawful, transparent and accountable manner. We adhere to the principles of data minimisation and data economy and prefer to use anonymised data whenever possible.

Personal data is any information relating to an identified or identifiable natural person. When processing such data, which includes collecting, storing, transferring or deleting data, we strictly comply with legal requirements. We also ensure that any data that is no longer required is deleted and that all personal data is treated confidentially.

## 1. Permissibility and information obligations

At Value One, we only process personal information when it is permitted for one of the following reasons:

- To comply with legal obligations: We process data when required, presumed or permitted by government regulations.
- Contract performance: We process personal data for the establishment, execution and termination of contracts.
- Consent: We process data based on the voluntary consent of the data subject. Before consent is given, we inform the data subject about the data processing.
- Legitimate interest: We process personal data when it is necessary to fulfil a legitimate interest of Value One.

We are aware of our obligations to provide information. Whenever we collect personal data, we provide the data subject with information about data protection.

## 2. Collecting, transmitting and processing of data

At Value One, we are committed to transparency and responsibility in the way we handle personal information. When someone uses our websites and smartphone applications, we tell them what personal data we process and how we do it. When designing websites and smartphone applications, we ensure that privacy information is easily recognisable, readily accessible and always available.

The transfer of personal data, both within and outside the Value One Group, only takes place in accordance with the requirements of permissibility. The recipient of the data is obliged to use it only for specific, permitted purposes. If we transfer data to a recipient in a third country, we will ensure that they provide a level of data protection equivalent to our data protection standards or that we have the explicit consent of the individual concerned.

In cases where we are contracted to process personal data without being responsible for it ourselves, this is data processing on behalf of a third party. In such cases, we will take reasonable steps to ensure that the processing complies with data protection law. In case of data processing on behalf of a principal, the principal retains full responsibility for the proper performance of the data processing.

## 3. Rights of the individuals and data protection incidents

Everyone has the right to request confirmation as to whether we are processing their personal data. If this is the case, they have the right to be informed. In addition, everyone has the right to request the correction of inaccurate personal data and the immediate deletion of personal data. Everyone also has

the right to receive their personal data provided to us in a structured, common and machine-readable format.

We take data breaches very seriously. A data breach is any unintentional or unlawful destruction or loss of personal data. Any employee who becomes aware of a potential data breach must report it immediately, including all known relevant information. Immediate reporting is critical as further action may need to be taken within 72 hours.

#### **4. Responsibilities, review and sanctions**

All employees and executives are responsible for reviewing and complying with this policy.

Value One will consistently punish misconduct and violations of internal policies, regardless of the rank and position of the individuals involved.