TRANSPARENCY DECLARATION FOR PORTFOLIO COMPANIES, SERVICE PROVIDERS, AND NETWORK PARTNERS

1. CONTROLLER ACCORDING TO GDPR ART. 4 (7)

AM Ventures Holding GmbH
Thomas Köhler
Petersbrunner Str 1b
82319 Starnberg
Tel: +49 162 4096 851
E-mail: info@amventures.com

2. DATA PROTECTION OFFICER

Manfred Engelhardt
Schillerstrasse 25
74214 Schöntal
Tel.: +49 7943 4309805
E-mail: datenschutz@ds-beratung.eu

3. PROCESSING PURPOSE / CATEGORIES OF DATA

We process personal data (data collection, processing, or use) in order to achieve our business purpose and comply with legal guidelines as well as our own justified interests for the benefit of our employees and shareholders.

Processing occurs in particular for these categories of data subjects:

PORTFOLIO COMPANIES – STATUS: INVESTED

Personal data is processed to implement contracts as defined in GDPR Art. 6 (1) lit. b, based on justified interests as defined in GDPR Art. 6 (1) lit. f and to meet legal obligations. Categories of personal data:
- Information about persons, contact data, address data, function/position of the person in the company, contract data, invoicing data, account data, purchase data, date of birth, social networks

PORTFOLIO COMPANIES – STATUS: INITIATION

Personal data is processed to implement pre-contractual measures as defined in GDPR Art. 6 (1) lit. b, based on justified interests as defined in GDPR Art. 6 (1) lit. f and to meet legal obligations. Categories of personal data:
- Information about persons, contact data, address data, function/position of the person in the company, contract data, invoicing data, account data, purchase data, date of birth, social networks

SERVICE PROVIDERS

Personal data is processed to implement contracts as defined in GDPR Art. 6 (1) lit. b and to meet legal obligations. Categories of personal data:
- Information about persons, contact data, address data, function/position of the person in the company of the supplier, contract data, invoicing data, account data, date of birth

NETWORK PARTNERS

Personal data is mainly processed to answer inquiries and prepare contracts. Legal basis: GDPR Art. 6 (1) lit. b and GDPR Art. 6 (1) lit. f. Categories of personal data:
- Information about persons, contact data, address data, function/position of the person in the company, date of birth, social networks
4. **Recipients of personalized information**

Personal data is processed to provide general company information (e.g., company and industry brochures), seasonal information (e.g., summer mailing, Christmas mail), information about events & anniversaries (e.g., in-house trade fair, technical lectures), and specific technical information (e.g., industry news, technological developments). This information is provided electronically, per mail, per phone, or in person. Legal basis: safeguarding our own justified interests pursuant to GDPR Art. 6 (1) lit. f for the continuous improvement of our business relationships, increase of our service quality, and strengthening of our customer loyalty for the benefit of our company, our employees, and our shareholders.

5. **Recipients of personalized advertising**

Personal data is processed based on consent obtained for the provision of personalized advertising. Contact is made per e-mail, phone, fax, SMS, mail, social networks, or a personal visit. Personalized advertising is provided based on the respective purpose of the underlying consent (e.g., receipt of birthday mail). Legal basis: GDPR Art. 6 (1) lit. a.

6. **Storage duration:**

Personal data is stored as long as is necessary for the processing purpose (No. 3) or for statutory evidence and archiving obligations. We store personal data in the categories “Portfolio company status: initiation and network partners” for 18 months unless countermanded by legal evidence and archiving terms. Legal basis: safeguarding our own justified interests pursuant to GDPR Art. 6 (1) lit. f for the continuous improvement of our business relationships, increase of our service quality, and strengthening of our customer loyalty for the benefit of our company, our employees, and our shareholders.

In case of consent: The storage duration is based on the purpose of the consent. After revocation of consent, the processing is restricted, and the data deleted after 30 days if no statutory evidence and archiving obligations countermand this.

7. **Categories of recipients:**

Personal data are transferred to the following categories of recipients if necessary:
- IT service providers (provide information and telecommunication services)
- marketing service providers (creation and support of advertising measures)
- shipping service providers (shipping of e-mail advertising)
- logistics service providers (shipping of products and documents)
- suppliers (purchase of products / services related to end customers)
- subcontractors (services based on service and work contract)
- auditors (acceptance-relevant audit)
- file and data destroyers (proper disposal of files and data carriers)
- public agencies and institutions (e.g., tax agency, courts)
- tax consultants (e.g., proper accounting, balance sheet compilation)
- financial service providers (e.g., banks, SCHUFA, Kreditreform)

8. **Data subject rights:**

Data subjects may ask for information about their stored personal data at any time via the contact data provided above. In addition, they have the right for correction, deletion, restriction of processing, and data portability. There is no obligation to provide personal data to us. However, this may make fulfilling the purposes in No. 3 impossible or only partially possible. We do not perform automated decision-making processes or profiling. In addition, data subjects have the possibility to contact our Data Protection Officer or the responsible privacy protection agency.
9. **Right to object**

If processing occurs based on our justified interests, an objection to this processing can be filed. This applies in particular for processing as part of direct advertising.

10. **Revocation right:**

Data subjects may revoke their consent for the collection and storage of their personal data as defined in GDPR Art. 6 (1) lit. a or Art. 9 (2) lit. a through us at the contact data listed above, effective for the future. This does not affect the legality of the data processing based on the consent performed up to the revocation.

As of 11/2019