

Data Privacy Policy for Events of Viking

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1. General information

Viking S.A., Z.I. Haneboesch, L-4562 Differdange/Nieder Korn, Luxembourg, DataProtectionOfficer@viking-emea.com, (in the following referred to as "**Viking**") attaches great importance to the protection of your personal data. This data privacy policy describes how Viking as the **controller** (also referred to in the following by the words "**we**", "**us**" and "**our**") uses and protects personal data collected in the course of an exhibition or other event (including training).

Personal data (in the following referred to as "**data**") are all data which refer to you personally, including for example your name, address, and e-Mail address. We only collect and process your personal data in compliance with the provisions of the EU General Data Protection Regulation ("**GDPR**") and other provisions of European and applicable national data protection law.

Any **data subject** (anyone affected of data processing activities) can contact our **Data Protection Officer** with questions and suggestions directly at any time. Our Data Protection Officer can be contacted as follows:

Viking S.A., Data Protection Officer, Z.I. Haneboesch, L-4562 Differdange/Nieder Korn, Luxembourg, DataProtectionOfficer@viking-emea.com.

2. Collection and use of your data

In context of your visit to the Viking booth (or your attendance of a Viking training session), you may request further information which is initially recorded on a contact sheet or similar form, alongside your business contact details (via business card or by filling in the fields). These data will be processed electronically internally, in order to fulfil your request. For that purpose, we might store and process your data in our CRM system, and might add further notes regarding your person or request.

We might provide you with postal advertising (direct advertising) as it is our legitimate interest to carry out direct marketing activities. However, you can object at any time. Any marketing activities via e-Mail require your prior explicit consent.

3. Notes on legitimacy and period of storage

3.1. Legitimateness of the processing of personal data

The processing of your personal data is legitimate if you have given your consent as stipulated in Article 6 (1) sentence 1 a) GDPR. **You have the right to withdraw your consent at any time (cf. Art. 7 GDPR).**

Under Article 6 (1) sentence 1 b) GDPR, the processing of your personal data is legitimate if such processing is necessary for the performance of a contract with you or your company. This also applies to all processing operations which are relevant prior to entering into a contract.

Under Article 6 (1) sentence 1 c) GDPR, the processing of your personal data is legitimate if such processing is necessary for compliance with one of our legal obligations.

Under Article 6 (1) sentence 1 f) GDPR, the processing of your personal data is legitimate if such processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party.

You have the right to object, on grounds relating to your particular situation, at any time to the processing of data concerning you based on Art. 6 (1) f) GDPR (cf. Art. 21 GDPR). Viking may then no longer process the data relating to you unless Viking demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If the data relating to you is processed for the purposes of engaging in direct advertising, you have the right to object at any time to the processing of your data for such advertising purposes.

3.2. Period of storage and deletion of data

Any personal data which we collect, process and store will be kept by us for as long as there is a specific purpose for such storage. Your data will be deleted or their processing restricted as soon as the specific purpose for which they were stored no longer applies.

It is possible, however, that European regulations, applicable national laws or other rules may require us to store data which we have processed for a longer period of time. We will delete or restrict the processing of your data when these (statutory) data retention periods have expired.

4. Your rights

For the purposes of the GDPR you are the **data subject** of any of your personal data which we process. As a data subject you have the following rights with regard to Viking:

4.1. Right of access by the data subject

You have the legal right to request information at any time about whether we are processing your personal data. If this is the case, you have the right to be informed about the extent to which your personal data is being processed (cf. Article 15 GDPR).

4.2. Right to rectification

You have the right to obtain from Viking EMEA the rectification of inaccurate personal data concerning you and/or to have incomplete personal data completed (cf. Article 16 GDPR).

4.3. Right to restriction of the processing

In certain circumstances you have the right to have the processing of your personal data restricted (cf. Article 18 GDPR).

4.4. Right to erasure ('right to be forgotten')

In certain circumstances you have the right to obtain from Viking EMEA the deletion of personal data concerning you without undue delay. The right to erasure does not apply if processing is necessary (cf. Article 17 GDPR).

4.5. Right to be informed

If you have asserted your right to rectification, erasure or restriction to Viking EMEA, Viking EMEA must communicate any rectification or deletion of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort (cf. Article 19 GDPR).

4.6. Right to data portability

You have the right to receive any personal data concerning you which you have provided to Viking EMEA in a structured, commonly used and machine-readable format. In certain circumstances you also have the right to transmit those data to another company without hindrance from Viking EMEA to which the personal data have been provided initially (cf. Article 20 GDPR).

4.7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you based on Article 6 (1) sentence 1 f) GDPR (cf. Article 21 GDPR). Viking EMEA may then no longer process the personal data relating to you unless Viking EMEA demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If the personal data relating to you is processed for the purposes of engaging in direct advertising, you have the right to object at any time to the processing of your personal data for such advertising purposes.

4.8. Right to withdraw the consent

You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the legitimacy of processing based on consent before its withdrawal (cf. Article 7 GDPR).

4.9. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

5. Transmission to affiliated undertakings

In certain circumstances, data provided by you may be transmitted to affiliated undertakings of Viking if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. In this case also Viking remains your first point of contact and you are entitled to assert your rights against Viking.

In some circumstances, Viking may transfer the data to countries outside the European Economic Area. Viking's affiliated undertakings will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Viking sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer, if this is necessary.

Further information about affiliated undertakings and their data privacy provisions is available here: <https://www.viking-emea.com/contact>.

The processing of the aforementioned data is legitimate under Art. 6 (1) b) or f) GDPR. The data are erased as soon as the specific purpose for which they were stored no longer applies and provided that they are not subject to any legal archiving obligations.

6. Newsletter

6.1. Sending of Newsletter

You can subscribe to a free newsletter. With your consent you will receive periodic e-Mails about fire protection products, services, training and event information. The data which you enter when subscribing to the newsletter are transmitted to us.

We need your e-Mail address in order to send you the newsletter and to identify and check that you have given your consent. The other information you provide is given voluntarily.

We erase your data as soon as you or we have ended the subscription for the newsletter. You can cancel the newsletter subscription at any time by withdrawing your consent with effect for the future. There is a link in every newsletter sent to you which you can click to automatically unsubscribe. Alternatively, you can send an e-Mail to contact@viking-emea.com or a message to the controller referred to above in this Data Privacy Policy.

6.2. Disclosure to third parties

Our newsletter is either sent by Viking directly or by our service provider, Clever Elements GmbH, Prinzessinnenstr. 19-20, D-10969 Berlin, Germany ("**Clever Elements**"). Clever Elements stores the data entered by you for Viking for the purpose of sending the newsletter. We use the services of Clever Elements as a **processor**.

The services provided by the Germany-based company Clever Elements are subject to the GDPR and the stringent requirements of the processing agreement made with it. Your data are only sent to third parties by Clever Elements in compliance with the legal requirements of the GDPR.

Clever Elements can use the data of the recipients to optimize or improve its own services, such as to technically optimize mailing and for the presentation of the newsletters or for statistical purposes via reporting and tracking methods like open and click rates. Our newsletter contains a so-called tracking pixel. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analyses. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, Clever Elements may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects. Within our Clever Elements account, we can access the campaign results (open and click rates, which links clicked, repeated clicks etc.), and can also create downloads of campaign reports. Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by Clever Elements. We use this information in order to improve the sending of our newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. In case you have consented to the data processing, this processing is legitimate under Article 6 (1) sentence 1 a) GDPR. You can withdraw your consent with effect for the future at any time.

Furthermore, it is legitimate under Article 6 (1) sentence 1 f) GDPR to pass on your data (e.g. name, e-Mail address and IP address) to Clever Elements as we use Clever Elements' software to send the newsletter and to carry out statistical analyses.

We will only process your data for as long as necessary to fulfil the purpose for which they have been collected. You will find more information about data protection at Clever Elements at: <https://www.cleverelements.com/privacy>.

7. General provisions

7.1. Adaptations

If this policy would be amended, the amended version will be made available at the next exhibition or other event following the date of the modification. For ease of access, it may also be published on our website <https://www.viking-emea.com/privacy>.

7.2. Applicable law

This policy shall be governed interpreted and executed in accordance with Luxembourgish law, to the extent permitted by law.

We may update this Data Privacy Policy from time to time. We therefore recommend that you regularly read this Data Privacy Policy to ensure that you are familiar with our data protection practice. This Data Privacy Policy has been last updated on 19-January-2019.