

Privacy Policy Adendum (Riese & Müller RX Services)

In the following, we shall inform you about the processing of personal data in connection with the Riese & Müller RX Services. Personal data means any information relating to an identified or identifiable natural person (Article 4 no. 1 GDPR). This includes information such as your first and last name, your address, your email address, or your telephone number.

The controller under data protection law is:

Riese & Müller GmbH
Am Alten Graben 2
D-64367 Mühlthal
Phone: +49 6151 36686-0
Fax: +49 6151 36686-489
Email: dataprivacy@r-m.de

You can contact our data protection officer at the following address:

CTM-COM GmbH, Mr. Moritz Görmann
Marienburgstrasse 27
D-64297 Darmstadt
Phone: +49 6151 3942-72
Email: datenschutz@ctm-com.de

Please also note the comprehensive information provided by us in accordance with Article 13 GDPR on the processing of our customers' personal data at: www.rm.de/datenschutz/, in particular your data subject rights and options listed there and to which authority you can assert them.

A. Data Use, Processing Purposes and Legal Basis

In order to provide the RX Services you request, further personal data of yours will be collected, processed and used.

In some cases, we also use external service providers for processing. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly checked. The data transfer to such external service providers takes place on the basis of processing agreements (Article 28 GDPR).

If we secure customer property in the event of theft as part of the provision of an RX Service (e.g. ConnectCare), we will transmit your personal data to the police. Here, only such data (name, contact details, details of the bike and position details of the bike) as is necessary to recover and secure the customer's property will be transmitted to the police. This transmission is carried out on the basis of Article 6 (1) (b) GDPR for the performance of contractual obligations.

The third parties mentioned above may be domiciled either within or outside the European Economic Area ("EEA"). Where such third parties are domiciled outside the EEA in a country that does not ensure an adequate level of protection for personal data or for which there is no adequacy decision from the European Commission, the controller has entered into legally binding transfer agreements with the relevant recipients in the form of standard clauses approved by the EU Commission or taken other appropriate protective measures in accordance with the GDPR. In this context, you have the right to request copies from us in writing of the relevant document that enables the transfer of personal data to these countries.

You are neither legally nor contractually obliged to provide us with your personal data. However, it may be the case that certain functions or services are dependent on the provision of personal data. If you do not provide personal data in these cases, this may result in functions or services not being available or only being available to a limited extent.

The specific processing purposes, the data affected and the legal basis for data processing within the scope of RX Services are listed below:

a) Activation, conclusion of contract and contractual relationship

As part of the activation or conclusion of the contract and the contractual relationship, the following data categories are processed:

- Contact details (last name, first name, address, email address and, if you provided it, telephone number) to get in touch with you
- Personal data (date of birth) for the purpose of a sanctions list check
- Account data (My Bike Account, configuration data and purchase date of the bike etc.)
- Contract data (e.g. term and expiry date of the service)

We only process your payment details (such as bank details or credit card details) if you book a paid RX Service.

Data processing is carried out on the basis of Article 6 (1) (b) GDPR to provide the RX Services you request and for the performance of contractual obligations.

We process the tracking or geodata based on the consent you have given (Article 6 (1) (a) GDPR). You have the right to withdraw your consent at any time. The lawfulness of the processing carried out on the basis of the consent until the withdrawal shall remain unaffected, however. To exercise this right, you can contact us at any time using the contact details mentioned above.

b) Provision of RX Services

As part of the RX Services, Riese & Müller provides various services such as GPS tracking for theft protection, the preparation of driving statistics, etc.

We transmit the personal data (first name, last name, address and communication data) necessary for the provision of the RX Services you request and necessary for the performance of the contract to the following categories of recipients:

(1) Service providers for communication, connectivity, localization and official processing of recovery

If necessary to provide the service, we share the data with our service providers for communications, connectivity, localization and official processing of recovery. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly checked. The data transfer takes place on the basis of processing agreements (Article 28 GDPR). In particular, your personal data will be disclosed to the following third parties as processors for the purposes mentioned above:

IoT Venture GmbH
Hilpertstrasse 31
64295 Darmstadt
Germany

rapidmail GmbH
Wentzingerstrasse 21
79106 Freiburg
Germany

Comodule OÜ
Dunkri 9,
Tallinn 10123
Estonia

(2) Payment service providers

If you have entered into a contract for a paid RX Service with us, we will transmit your transaction data (name, date of booking, payment method, amount and payee, if applicable bank details or credit card details) to the payment service provider responsible for processing the payment. For the technical processing of the payment, we use the service provider Mollie B.V., Keizersgracht 126, 1015 CW Amsterdam, Netherlands. If you pay by SEPA direct debit, Mollie B.V.'s trust company, Stichting Mollie Payments, Keizersgracht 126, 1015 CW Amsterdam, collects the money. The payment is billed via the payment service provider Mollie B.V., Keizersgracht 126, 1015 CW Amsterdam, Netherlands.

Data processing is carried out on the basis of Article 6 (1) (b) GDPR for the performance of contractual obligations.

(3) Insurance partners

If you choose an RX Service with insurance coverage, the insurance services included in the RX Services will be provided by the customer joining a group insurance contract concluded between Riese & Müller and an insurance partner. By selecting an RX Service with insurance coverage, you join this group insurance contract as an insured person.

If you are resident in Germany, we will transmit the information you provide to Zurich Insurance plc Branch for Germany, Platz der Einheit 2, 60327 Frankfurt am Main, Germany ("Zurich Insurance") and to Horn & Weber, proprietor Stephan Weber e.K., an insurance broker of Zurich Insurance, for joining the group insurance contract, for example for issuing the policy. We also transmit your data to Zurich Insurance and Horn & Weber, proprietor Stephan Weber e.K. to the extent that this is necessary for the performance and processing of the group insurance contract which you have joined, such as information about a claim to verify whether an insured event has occurred and how high this is, or when a theft is reported.

If you are resident in Belgium, the Netherlands or France, we will transmit the information you provide to Laka NL B.V., Raamplein 1, 1016 XK Amsterdam, Netherlands ("Laka") for joining the group insurance contract, for example for issuing the policy. We also transmit your data to Laka to

the extent that this is necessary for the performance and processing of the group insurance contract which you have joined, such as information about a claim to verify whether an insured event has occurred and how high this is, or when a theft is reported. For the performance and processing of the group insurance contract, Laka will, if necessary, transfer your data to third parties in accordance with Laka's corresponding data protection notice; Laka's corresponding data protection notice governs this data processing and transfer.

The legal basis for this processing of personal data for pre-contractual and contractual purposes and claims processing is Article 6 (1) (b) GDPR.

c) Information about new offers and product improvements via email

If you consent, you will receive information about new offerings and product improvements to the RX Services by email. In this case, we use your email address and information about the services you have booked to contact you by email and to send the requested information.

The legal basis for using the email address and further information about the services you have booked to send the information email you have ordered is the consent you have given in accordance with Article 6 (1) (a) GDPR.

The information email is sent via our service provider rapidmail GmbH, Wentzingerstrasse 21, 79106 Freiburg, Germany, with which we have concluded a processing agreement.

Duration: The data you have stored with us as part of your consent for the purpose of the information email will be stored by us until you revoke your consent and will be deleted from both our servers and rapidmail's servers after you unsubscribe. Data stored by us for other purposes (e.g. email addresses for contract processing) shall remain unaffected.

Withdrawal option: You have the option to withdraw your consent to data processing at any time with effect for the future. For this purpose, you can send us an email to rx-services@rm.de or use the unsubscribe link located at the end of each email. The lawfulness of the data processing operations already carried out shall remain unaffected by the withdrawal.

d) Connectivity service, movement and location data & riding statistics

As part of our production of bikes equipped with an RX chip, a tracking ID is associated with the serial number of the corresponding bike.

If you register your My Bike account, it is possible for us to associate the tracking ID and serial number with your personal data. The motion and location data (GPS data) as well as riding statistics are only collected when you use an RX Service. The collection of motion and location data as well as riding statistics is necessary so that we can provide the location and riding data-related services you request as part of the RX Services. In this way, we can, for example, carry out a GPS localization of the bike as part of the recovery service you request or provide you with an overview of route data for the journeys you have undertaken.

The motion and location data as well as riding statistics are processed based on your consent (Article 6 (1) (a) GDPR). You have the right to withdraw your consent at any time. The lawfulness of the processing carried out on the basis of the consent until the withdrawal shall remain unaffected, however. To exercise this right, you can contact us at any time using the contact details mentioned above.

As part of the theft service you request, we will transfer the data mentioned (name, contact details, bike details, GPS data of the bike) to the police so that they can recover the customer's property. This transfer is carried out on the basis of Article 6 (1) (b) GDPR to provide the RX Services you request and for the performance of contractual obligations.

e) RX Services Monitoring

For the RX Services to function properly, the RX chip installed in the bike must work. In order to verify the functionality of the RX chip, we carry out system tests at regular intervals. As part of the system tests, usage data of the RX chip (such as battery capacity, battery discharge curve and transmission time), which we have already collected to provide the services you request, is temporarily processed.

The legal basis for this processing of personal data is Article 6 (1) (f) GDPR. Riese & Müller's legitimate interest is in maintaining the functionality of the RX chip and thus also the provision of the RX Services and the fulfillment of our usual service.

You have the right to object to such processing on grounds relating to your particular situation at any time. To exercise this right, you can contact the Riese & Müller Customer Care Team at any time, who will then deactivate RX Services monitoring for your bike.

f) Mobile number validation

We need your mobile phone number for some of our services and as part of the RX Service requested between you and Riese & Müller, your specified mobile phone number will be validated.

This is done on the basis of Article 6 (1) (b) GDPR. The data is collected and checked to provide the RX Services. The operation is necessary to ensure a smooth process, e.g. when recovering your bike, and to avoid misuse of your communication data.

We transmit this to our validation service provider

Vonage B.V.
Prins Bernhardplein 200
1097 JB, Amsterdam
Netherlands

for the purpose of checking and validating your communication data.

Vonage B.V. is a processor within the meaning of Article 28 GDPR and is contractually bound to comply with the GDPR. Without providing your mobile phone number, full use of the RX Services is not possible.

g) Other service providers

In accordance with applicable data protection regulations, we may disclose your personal data to external processors (Article 28 GDPR) who act on our behalf and provide services in connection with the RX Services (e.g. host providers, IT service providers). The data transfer takes place on the basis of processing agreements. Our processors may only process your personal data to the extent necessary for the performance of their specific tasks. They are contractually obliged to only process your personal data on our behalf and in accordance with our instructions.

If these processors are domiciled outside the European Union or the European Economic Area, they are either domiciled in third countries for which an adequacy decision has been made by the European Commission, or an adequate level of protection is guaranteed by standard data protection clauses issued by the European Commission, which we stipulate with the external processor.

In addition to the processors named elsewhere in this data protection notice, your personal data will in particular be disclosed to the following third parties as processors:

Amazon Web Services EMEA SARL,
38 avenue John F. Kennedy,
L-1855 Luxembourg
(Hosting)

Confluent, Inc.,
899 W Evelyn Avenue,
Mountain View, CA 94041
USA
(Hosting)

Retool Inc.
292 Ivy St.
Suite F
San Francisco, CA 94102
USA
(Hosting)

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