DATA PROTECTION INFORMATION FOR KX SERVICES
for data subjects pursuant to Art. 13 and 14 GDPR

Controller pursuant to Art. 24 GDPR:

Kwizda Agro GmbH ("KWIZDA")
Universitätsring 6
059977 10
DatenschutzAgro@kwizda-agro.at

represented by:

Dkfm Dr Johann F Kwizda and
DI Ronald Hamedl

1. DATA PROTECTION OFFICER PURSUANT TO ART. 37 ET SEQ. GDPR

KWIZDA is a private company and not an authority or public body within the meaning of Art 37 (1) (a) GDPR. As part of our core activities, we do not carry out extensive processing of special categories of data or personal data relating to criminal convictions and offences or extensive regular and systematic monitoring of data subjects in accordance with Art 37 (1) (b) and (c) GDPR. For this reason, KWIZDA is not obliged to appoint a data protection officer.

2. HANDLING OF PERSONAL DATA

KWIZDA takes the protection of personal data very seriously.

Personal data is information that can be assigned to you individually. Examples of this include your address, name, postal address, e-mail address or telephone number. Information such as the number of users who visit a website is not personal data because it cannot be assigned to a person.

KWIZDA treats personal data in accordance with the statutory data protection regulations (in particular the EU General Data Protection Regulation) and this privacy policy.

2.1. Processing your data as part of the KX services

We process the following categories of personal data as part of the KX services (KX Planner, KX Vine, KX Field, KX Rain):

2.1.1. Registration data

- E-mail address
- Salutation
- First name, surname
- Postcode, city

- Country
- Company name (optional)
- Street name and house number
- Agricultural Sector

2.1.2. Operating and field-specific data

- Spray plan title
- Cultivation type (organic/conventional)
- Crop and variety
- Field location
- Field size
- Row spacing
- Application data (spray date, BBCH stage, foliage wall height, etc.)
- Product data (name, category, unit)
- Stock levels and demand for application products

2.1.3. Technical data

- Browser type and version
- Operating system used
- Referrer URL
- IP address
- Access time
- Amount of data transferred
- Other technical parameters]

2.2. Cookies and similar technologies

Our website uses cookies and similar technologies (e.g. Local Storage, Session Storage, tracking pixels; collectively referred to as "cookies"). Cookies are small text files that are stored on your device via your browser, or which access information already stored there. Some cookies are technically necessary for the operation of the website, while others are used for statistical or marketing purposes. Cookies remain on your device until you delete them or they expire automatically. Through cookies, we can recognise your browser when you visit again.

2.2.1. Necessary Cookies

These cookies are required to provide our website and enable basic functions (e.g. site navigation, load balancing, login protection, consent storage). Without them, the website will not function properly.

2.2.2. Statistics Cookies

These cookies help us to understand how visitors use our pages (e.g. pages viewed, length of stay) so we can improve content and features. We only use these cookies with your consent.

2.2.3. Marketing Cookies

These cookies enable us and, where applicable, third parties to display interest-based content/advertising and measure the success of campaigns. We also only use these cookies with your consent.

2.2.4. Complete Cookie List & Details

A complete, regularly updated overview of all cookies and tools used (including purpose, provider, duration, recipients and, where applicable, third-country transfers) can always be found on the following page: **https://www.kx-digital.com/en/legal**

2.2.5. Consent & Withdrawal

- When you visit for the first time, we ask for your consent via our cookie banner.
- Cookies can be deleted/blocked via your browser settings, except for technically necessary cookies.

2.3. Purposes of data processing

We process your personal data for the following purposes:

a) Provision of KX services
b) Creation and management of spray plans
c) Provision of weather forecasts and disease pressure forecasts
d) Advice from Kwizda sales representatives
e) Service improvement and product development
f) Marketing purposes (with consent)
g) Data synchronisation to ensure data accuracy:
We use to complete incomplete registration data:
  - Existing customer master data from our internal ERP system
  - Publicly accessible company data (e.g. from the Ministry of Finance)

to ensure correct company names and legal forms

Legal basis: Art. 6(1)(f) GDPR (legitimate interests)
Legitimate interest: Data accuracy and proper business processing

2.4. Recipients of the data

Your data will be processed by:

a) KWIZDA employees to the extent required
b) KWIZDA sales representatives for consulting purposes
c) KWIZDA HOLDING GMBH

2.5. Technical and organisational measures

We use the widespread SSL (Secure Socket Layer) method in conjunction with the highest level of encryption supported by your browser when you visit our website. As a rule, this is 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can recognise whether an individual page of our website is transmitted in encrypted form by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

Implemented security measures:

1. Encryption:
   - Transport encryption (TLS version, cipher)
   - Memory encryption
2. Access control:
   - Authentication methods
   - Authorisation concept

3. RIGHTS OF DATA SUBJECTS

You have the right to

a) request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you can request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of appeal, the origin of your data if it was not collected by us, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information on its details;

b) in accordance with Art. 16 GDPR, to immediately request the correction of incorrect or incomplete personal data stored by us;

c) to demand the erasure of your personal data stored by us in accordance with Art. 17 GDPR, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;

d) in accordance with Art. 18 GDPR, to demand the restriction of the processing of your personal data if the accuracy of the data is disputed by you, the processing is unlawful but you refuse to delete it and we no longer need the data, but you need it for the assertion, exercise or defence of legal claims or you have lodged an objection to the processing in accordance with Art. 21 GDPR;

e) in accordance with Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller;

f) in accordance with Art. 7 (3) GDPR, to withdraw your consent once given to us at any time. As a result, we may no longer continue the data processing that was based on this consent in the future;

g) to lodge a complaint with a supervisory authority regarding the unlawful processing of your data by us in accordance with Art 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters. In Austria, this is the Austrian Data Protection Authority Barichgasse 40-42, 1030 Vienna, +43 1 52 152-0, .dsb@dsb.gv.at.

3.1. Exercising data subject rights

You yourself decide on the use of your personal data. Should you therefore wish to exercise any of your above-mentioned rights against us, you are welcome to contact us by email at DatenschutzAgro@kwizda-agro.at. Please send a copy of an official photo ID together with your request for clear identification and assist us in specifying your request by answering questions from our responsible employees regarding the processing of your personal data. Please also state in your enquiry in which role (employee, applicant, supplier, customer, etc.) and during which period you have had a relationship with us. This will enable us to process your enquiry promptly.

3.2. Right to object

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, provided that there are reasons for this arising from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right to object, which will be implemented by us without specifying a particular situation.

If you wish to exercise your right of cancellation or objection, simply send an e-mail to DatenschutzAgro@kwizda-agro.at.

4. DATA RETENTION PERIODS (DELETION PERIODS)

In accordance with the applicable data protection requirements, we are obliged to delete personal data immediately as soon as the purpose for the processing has ceased to exist in accordance with Art. 5 para. 1 lit e GDPR. In this context, we would like to point out that statutory retention obligations and periods constitute a legitimate purpose for the processing of personal data.

In any case, we will store and retain data in personalised form until the end of the business relationship or until the expiry of applicable guarantee, warranty or limitation periods; in addition, until the end of any legal disputes in which the data is required as evidence; or in any case until the end of the third year after the last contact with a business partner.

In addition, we adhere to the following deadlines:

4.1. Industry-specific deadlines

a) Storage obligations according to § 11 para. 3 **Plant** Protection Products Act: 5 years
b) Storage obligations according to § 2 para. 6 Fertiliser Ordinance: 2 years

4.2. Accounting and tax law

Retention obligation under tax law according to §§ 207 para. 2, 209 BAO: 10 years

4.3. Contracting

a) Purchase price claim for movable property in accordance with § 1062 in conjunction with § 1486 ABGB: 3 years
b) Purchase price claim for immovable property (from contract § 1486 ABGB): 30 years
c) Claims arising from a contract for work and labour in accordance with Section 1486 ABGB (if the service was provided as part of a commercial or other business operation): 3 years
d) General damages according to § 1489 ABGB (compensation claims): 3 years (if damage and injuring party are known) / otherwise 30 years

4.4. Specific to the KX services

a) Registration data is stored for the duration of use of the service
b) After deactivating a user account, personal data will be deleted after the expiry of statutory retention periods
c) Spray plans and associated data are kept anonymised
d) Technical log data is stored in anonymised form to improve the service

5. UPDATES AND CHANGES TO THIS PRIVACY POLICY

Due to the further development of our website and offers on it or due to changed legal or official requirements, it may become necessary to change this privacy policy. You can access and print out the current version of this privacy policy at any time on our website at https://www.kx-digital.com/en/legal.