

Privacy Policy

for Business Partners, Including Agents pursuant to Articles 13 and 14 of the General Data Protection Regulation (GDPR)

AXIANS ICT Austria GmbH (hereinafter "AXIANS") expressly commits to complying with the legal provisions set forth in the GDPR (General Data Protection Regulation) and the Austrian Data Protection Act (DSG). AXIANS attaches great importance to the protection of personal data. Therefore, we are providing you with information regarding the data processing activities we carry out that are necessary to fulfill our legal and contractual obligations, as well as your rights in this regard.

This Privacy Policy applies to all individuals whose personal data we process in connection with a potential, existing, or past contractual or business relationship ("business relationship"). Accordingly, this Privacy Policy is primarily intended for our customers, partners, subcontractors, suppliers, and manufacturers (collectively referred to as "business partners"), including their respective contacts, employees, customers, subcontractors, suppliers, and other contractual partners/agents.

The definitions set forth in Article 4 of the General Data Protection Regulation (GDPR) apply to all terms used in this Privacy Policy. This includes, among other things, terms such as "personal data", "processing", "controller" or "processor".

1 Purposes and Legal Basis of Data Processing

We process your personal data for the following purposes and on the basis of the respective legal bases:

Your data is processed **to fulfill contractual obligations or to carry out pre-contractual measures and reviews (Article 6(1)(b) GDPR)**. This applies in particular to processing operations arising from and in connection with:

- the initiation, conclusion, and performance of contracts;
- processing inquiries; pre-contractual measures;
- Communication with contact persons and representatives of the business partner;
- customer service;
- Management and maintenance of customer and supplier relationships;
- Invoicing and accounting;
- Termination procedures;
- Fulfillment of (other) contractual obligations.

In addition, we process your data **based on a legal obligation (Article 6(1)(c) GDPR)**, in particular arising from and in connection with:

- Compliance with legal regulations and obligations;
- tax and fiscal obligations;
- Reviewing and processing requests from public authorities;
- Compliance with measures and obligations imposed by public authorities;

- Compliance with regulatory requirements.

Furthermore, we process your data **based on AXIANS' legitimate interest (Article 6(1)(f) GDPR)**, specifically for the following purposes:

- Sales, advertising, and marketing;
- Maintaining business relationships;
- Organizing and conducting events, webinars, and other gatherings, as well as sending related invitations;
- Verification of contractual partners (e.g., by consulting commercial and land registers);
- Creditworthiness and compliance checks;
- Compliance with and monitoring of internal compliance requirements and guidelines, and related documentation (in particular, prevention of fraud, corruption, and abuse; conducting audits; sanctions and export control checks; and other compliance checks);
- Processing of reports and inquiries related to the whistleblower system;
- Corporate organization and administration [in particular, (Group-)internal administration and reporting, cost analysis, (Group-)internal approvals for certain transactions, risk analysis, contract management, documentation and archiving purposes, etc.];
- Pursuing and defending against legal claims and sanctions by or against AXIANS;
- Review, preparation, and execution of share or asset deals (e.g., mergers, transfers of business operations, etc.) in which AXIANS is involved;
- Ensuring network and information security as well as compliance with technical and organizational measures in connection with the GDPR;
- Protecting the premises, data, and property of AXIANS and our customers.

Any further processing of your data may take place **within the scope of the consent you have provided (Article 6(1)(a) GDPR)**. If the processing is based on consent, you may revoke it at any time by sending an email to datenschutz@axians.at. The lawfulness of the processing carried out on the basis of your consent up until the time of revocation remains unaffected.

In connection with entering into contracts or for the smooth administration of our contractual relationship with business partners and/or to process your inquiries, you must provide us with the personal data that is necessary for establishing and carrying out the contractual relationship, as well as for any pre-contractual measures or the corresponding review and processing of your inquiries, and/or for which we are legally obligated to collect. If this data is not provided to us, we will generally have to refuse to enter into the contract or process the inquiry, or will be unable to perform an existing contract. However, you are not obligated to provide any data that is not required by law and/or for the fulfillment of the contract or the processing of inquiries.

2 Data Transfer, Recipients

The transfer of data relevant in each individual case is carried out on the basis of the contractual provisions/agreements or statutory, regulatory, or internal corporate requirements to the following entities:

- Tax office;
- Members of our company's supervisory board;

- Our agents and (potential) subcontractors in connection with the review, preparation, and/or execution of the order and the related rights and obligations;
- Our (other) suppliers, service providers, and manufacturers who offer and/or deliver services and/or products;
- Our IT system providers (in particular VINCI Energies Systèmes d'Information), cloud service providers (e.g., Microsoft or comparable providers) and other IT service providers;
- Third parties to whom we assign or transfer our rights and obligations, or in connection with the sale or transfer of part of our business or assets;
- Event organizers and advertising agencies;
- Our and your legal representatives in connection with the examination and enforcement of our claims and/or the defense against your claims;
- Any third parties you may have engaged or their affiliated companies within the meaning of Section 15 of the Austrian Stock Corporation Act (AktG);
- Courts and other authorities, as well as government agencies and institutions;
- Your creditors and other parties involved in any related legal proceedings, including in the case of voluntary wage assignments for due claims;
- Our auditors and financial or tax advisors;
- Our affiliated companies as defined in Section 15 of the Austrian Stock Corporation Act (AktG) (in particular VINCI Energies Europe East GmbH, VINCI Energies Deutschland ICT GmbH, VINCI Energies DACH CEE ICT GmbH, VINCI Energies CEE ITS GmbH, Axians Schweiz AG, and VINCI Energies Systèmes d'Information), including their affiliated companies and other subsidiaries, to the extent that the disclosure serves the purpose of contract performance or is necessary for accounting, tax, or auditing purposes, or for documenting product safety-related aspects, or in connection with statutory or group-internal compliance requirements.

For sales, advertising, and marketing purposes, your data will be imported into our CRM system (HubSpot) for further processing. In this context, your personal data is transferred to HubSpot (HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, VAT DE312070441) as our data processor.

We transfer personal data collected in connection with the contractual relationship between you (or your employer) and AXIANS—specifically regarding the application for and conduct of the business relationship—to CRIF GmbH, Leopoldstraße 244, 80807 Munich, and CRIF Bürgel Ressmann Ulm GmbH & Co. KG. The legal basis for this transfer is Article 6(1), first sentence, letters b and f of the General Data Protection Regulation (GDPR). The exchange of data with CRIF GmbH may also, under certain circumstances, serve to fulfill legal obligations regarding conducting creditworthiness checks. CRIF GmbH processes the data it receives and also uses it for profiling (scoring) purposes in order to provide its contractual partners in the European Economic Area and in Switzerland, as well as in other third countries where applicable, information for purposes including the assessment of the creditworthiness of natural persons. The transfer of personal data to third countries is carried out in accordance with Article 44 et seq. of the GDPR. Further information on the activities of CRIF GmbH and CRIF Bürgel Ressmann Ulm GmbH & Co. KG can be found in their information sheet or viewed online at www.crif.de/datenschutz.

Further information can be provided by the entities listed above if necessary. To request this, please contact us by email: datenschutz@axians.at

3 Data Categories

3.1 Data Collection Pursuant to Article 13 of the GDPR (Direct Data Collection):

Your data may have been provided to us directly by you.

3.2 Data collection pursuant to Article 14 of the GDPR (data collection via third parties):

In addition, in certain cases we receive your data from other sources, such as your colleagues or supervisors at your employer, any intermediaries commissioned by us or your employer, or other third parties (e.g., general contractors), event organizers, our contractual partners (e.g., general contractors), etc. Under certain circumstances, we may retrieve your data from publicly accessible sources (e.g., the commercial register, association register, land registry, etc.).

3.3 In both of the aforementioned cases, as described in sections 3.1 and 3.2, the following categories of data may be collected and processed:

- **Identification data**, such as title, first and last name, address, gender, and date of birth;
- **Employment data**, such as your position with your employer;
- **Contact information**, such as phone number, email address, and mailing address;
- **Data regarding your qualifications**, previous projects, and other information in your resume;
- **Your signature**;
- **Photographs** (in connection with a specific assignment or business transaction, such as training sessions);
- **Video surveillance data** (e.g., in connection with events or to secure AXIANS' premises and property as well as customer data);
- **Data from recordings of meetings or training sessions** (e.g., webinars, online meetings);
- **Where applicable, sensitive data**, such as information in your criminal record, citizenship, etc. [if required in connection with a (potential) business transaction].

We collect only the data necessary for the specific purpose; this means that, in some cases, less data than that described above may be sufficient, and the scope of the data processed by AXIANS depends on the individual case.

4 Data Processing for System Administration and Security Purposes

To comply with legal and/or regulatory (particularly data security) requirements and to ensure reliable IT operations, we process personal data of data subjects to the extent that they are integrated into our systems or participate in business processes. The processing serves to ensure the functionality, stability, and security of our IT systems as well as the proper conduct of business. To protect the data stored in our systems, we implement appropriate technical and organizational measures. These are intended, in particular, to protect against unauthorized access, loss, manipulation, disclosure, or other unlawful processing. These include, among other things, access restrictions, authorization policies, authentication procedures, encryption of data transmissions, security software, regular data backups, and the ongoing monitoring and updating of our IT infrastructure. The measures taken are regularly reviewed and adapted to the state of the art.

5 Data Processing Outside the EU/EEA

As a general rule, AXIANS does not process your data outside the EU/EEA. However, it cannot be completely ruled out that data may be transferred, at least in part, to third countries. This may occur, for example, in the context of contract fulfillment or cooperation with our data processors. In such cases, we ensure that an adequate level of data protection is guaranteed in accordance with Article 44 et seq. of the GDPR. This is achieved, in particular, through an adequacy decision by the European Commission pursuant to Article 45 of the GDPR or by entering into the European Commission's Standard Contractual Clauses pursuant to Article 46 GDPR. If neither an adequacy decision exists nor suitable safeguards are in place, a transfer will only take place under the conditions set forth in Article 49 of the GDPR.

6 Retention Period

We retain your personal data only for as long as necessary for the respective processing purposes. In particular, the retention period depends on:

- the duration of the existing business relationship,
- the necessity for contract initiation, execution, and termination,
- statutory retention periods (particularly under corporate and tax law, e.g., BAO, UGB),
- the statute of limitations for potential legal claims (generally 3 years from the time the damage and the party responsible are known), and
- the duration of any legal disputes in which the data is required, in particular as evidence.

Statutory retention requirements are generally seven years pursuant to § 132 BAO, and may be longer in certain cases (e.g., in the event of pending proceedings).

Furthermore, we store personal data only to the extent necessary to assert, exercise, or defend legal claims.

As soon as the aforementioned purposes no longer apply and there are no longer any statutory retention requirements, the data will be deleted or anonymized.

7 Your Rights

You generally have the rights to access (Article 15 GDPR), rectification (Article 16 GDPR), erasure (Article 17 GDPR), restriction (Article 18 GDPR), and data portability (Article 20 GDPR). If you have consented to the data processing, you have the right to withdraw your consent, on which the processing was based at any time (the lawfulness of the processing carried out on consent prior to its withdrawal remains unaffected). To withdraw your consent, contact us, in particular, by email at datenschutz@axians.at.

In addition, you have the right to object pursuant to Article 21 of the GDPR:

- You have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data concerning you that is carried out to safeguard the legitimate interests pursued

by AXIANS or a third party (within the meaning of Article 6(1)(f) of the GDPR); this also applies to profiling based on these provisions.

- In this case, AXIANS will no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing is necessary for the establishment, exercise, or defense of legal claims.
- If personal data is processed for the purpose of direct marketing (such as by sending letters, brochures, and newsletters, or through phone calls, emails, etc.), you have the right to object at any time (even without giving a reason) to the processing of your personal data for the purposes of such advertising; this also applies to profiling, insofar as it is related to such direct marketing. If you object to the processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Furthermore, you have the right, for reasons arising from your particular situation, to object to the processing of personal data concerning you that is carried out for scientific or historical research purposes, or for statistical purposes, unless the processing is necessary for the performance of a task carried out in the public interest.

If you believe that the processing of your data violates data protection law or that your data protection rights have otherwise been infringed, you may file a complaint with the competent data protection authority (<https://dsb.gv.at/>).

8 Name and contact information of the data controller

AXIANS ICT Austria GmbH

FN 127950m

Hafenstraße 2a

4020 Linz

Phone: +43 517 150

Email: office@axians.at

9 Contact Information for the Data Protection Officer

Mr. DI Vladimir Mlynar

Email: datenschutz@axians.at

10 Document Information

10.1 History

Version	Date	Approved	Revisions	Author
2	June 1, 2026	Vladimir Mlynar	Versioning was first introduced in Version 2; Updated version coordinated with Legal and the DPO	Legal

10.2 General Information

Scope	Applies to the processing of personal data arising from and in connection with a potential, existing, or past contractual or business relationship, including the respective contact persons, employees, customers, subcontractors, suppliers, and other contractual partners or agents
Purpose	Compliance with the information obligations under the GDPR (see, in particular, Article 12 et seq.)
Responsibility	DPO

10.3 Approved by

Approved by	DPO Vladimir Mlynar
Approved on	June 26, 2026
Confidentiality Level	C0-Public
Validity	This document is valid as of the date of publication. The owner of this document is AXIANS ICT Austria GmbH The document is reviewed once a year