

Privacy policy in accordance with Art. 12, 13 GDPR about the processing of personal data on the camLine e-Learning Platform.

The protection of your data is very important to us. Therefore, we would like to inform you below which data of your visit is collected in the course of using the camLine e-Learning Platform and for which purposes it is used.

Controller within the meaning of the General Data Protection Regulation (GDPR)

You use the camLine e-Learning Platform as part of your employment with your employer. Your employer is the controller for the processing of your data. We, camLine GmbH, Fraunhoferring 9, 85238 Petershausen, Germany (hereinafter "camLine"), make the camLine e-Learning Platform available to you on behalf of your employer. We are available to answer any questions you may have about data processing when using the camLine e-Learning Platform, but we are legally and contractually obligated to forward your request to your employer so that the employer can fulfill its legal obligations as a data controller. If you wish, we will also be happy to provide you with the relevant contact details of your employer so that you can raise your concern directly with them. Please feel free to contact camLine for this purpose (privacy@camline.com).

Personal data

The term personal data is defined in the General Data Protection Regulation (hereinafter "GDPR"). According to this, "personal data" is any information relating to an identified or identifiable natural person. This therefore includes, for example, your civil name, your address, your telephone number or your date of birth. Information about how you use camLine e-Learning Platform may also be personal data.

Contact

You have the option of contacting camLine via our e-mail address (e-learning@camline.com). We will use the personal data provided to us in this way solely for the purpose for which you provide it when contacting us.

Scope of data processing when using the camLine e-Learning Platform

Your employer has concluded a data processing agreement with camLine in accordance with Art. 28 GDPR. According to this agreement, we are obliged to ensure the necessary protection of your data and to process it in accordance with the applicable data protection regulations exclusively on behalf of your employer and in accordance with its instructions.

Access to the camLine e-Learning Platform

When you access the website to register on the camLine e-Learning Platform, the following personal data is collected, which your browser transmits and which is technically required to display the website and to ensure stability and security:

- Browser (type, version & language settings)
- the current IP address of the end device with which you are visiting our website
- date and time of access
- the pages you access on the camLine e-Learning Platform
- the internet service provider of the accessing system

We regularly do not know who is behind an IP address.

Registration

In order to use the camLine e-Learning Platform, users must register in advance. The registration of your personalized user access is carried out exclusively by camLine, either at the request of you as a user yourself or at the instruction of your employer. For this purpose, the following personal data of you as a user of the platform will be processed:

- first and last name
- e-mail address
- user name, password, camLine ID number, Cohort ID number
- company affiliation
- location (country).

The data is collected for the purpose of creating a user account for users, which is necessary to use the camLine e-Learning Platform and to carry out the training measures. Once you have registered, you will receive personal, password-protected access to the camLine e-Learning Platform and will be able to view and use the training courses and learning content provided and activated for you there.

Before each use of the camLine e-Learning Platform, you must log in using your user name or e-mail address and a password of your choice.

Use of the camLine e-Learning Platform

In the course of using the camLine e-Learning Platform, various types of data are processed. The extent to which your data is processed may vary, depending on which training courses are activated for you as a user and which learning content is taught there. For example, information entered by users such as course participation data, actions within the courses (e.g. entries, feedback, course progress), performance results from the courses (test results) and log data on the time and areas of participant access to the platform are processed. Thus, in the course of using the camLine e-Learning Platform, data about your learning progress (chapters completed and answers given, final test started/completed, percentage of pass/fail of all participants, date and time of final test, certificate) may be collected and stored.

If you pass the test at the end of the respective course or have otherwise successfully completed the respective course, you will receive a confirmation of your successful participation, depending on the design of the course.

In the course of regular reports or reports requested from time to time, data on your learning progress will be made available to your employer. You can find out more about this from your employer or contact us at privacy@camline.com.

In your user profile, you can voluntarily provide additional information about yourself from the time of registration, such as adding a profile picture or providing additional information within your profile, which will then be stored in the user profile. In your user profile, you will also find announcements of our upcoming events (webinars and product information events) prepared for you in the calendar function. In addition, you can use video content provided by us within the camLine e-Learning Platform (recording of webinars or events and further information on products and their application) voluntarily and independently of the implementation of the specific courses, if you are interested in this.

Legal basis for data processing

Your data is processed primarily for training purposes and to provide proof of completion of the training, thus for the purpose of implementing your employment relationship with your

employer, and thus on the legal basis of Section 26 (1) of the German Federal Data Protection Act (BDSG) or other legal basis. We process data directly related to the technical use of this website (IP address, log data) on the basis of a legitimate interest, Art. 6 (1) lit. f GDPR. Our legitimate interest is to provide you with the website containing the camLine e-Learning Platform, to ensure its security and stability, and to offer you a user-friendly operating experience. If you contact us of your own accord to obtain user access, we will also process your data on the basis of a legitimate interest pursuant to Art. 6 para. lit. f GDPR. This is to process your request accordingly. We process data used in direct connection with the display of upcoming events by us in your user profile in the calendar area on the basis of our legitimate interest, Art. 6 para. 1 lit. f GDPR, to inform you about information offers (webinars, product information) relevant to your field of activity and offered by us. For data that you voluntarily add to your user portal or for the use of our video content, the legal basis for processing is your consent pursuant to Art. 6 (1) lit. a GDPR.

Transfer of data and third country transfer (EU foreign countries)

Your data will not be transferred to third parties unless we are legally obliged to do so. Insofar as external service providers come into contact with your personal data, we have ensured through legal, technical and organizational measures as well as regular checks that they comply with the provisions of data protection laws.

In the case of a data transfer outside the European Union (EU) or the European Economic Area (EEA), the high European level of data protection does not exist in principle. In the case of a transfer, it may be that there is currently no adequacy decision by the EU Commission within the meaning of Article 45 (1), (3) of the GDPR. This means that the EU Commission has not yet positively determined that the country-specific level of data protection in the third country corresponds to the level of data protection in the EU/EEA based on the GDPR.

For the purpose of technical provision and hosting of the camLine e-Learning Platform, camLine uses offerings from Amazon Web Services Inc, 410 Terry Avenue North, Seattle, WA 98109-5210 ("AWS") and in doing so the German AWS data center in Frankfurt am Main. camLine has concluded a contract for commissioned processing with AWS in accordance with Art. 28 GDPR, in which AWS undertakes to process the data only in accordance with our instructions and to comply with the EU data protection level. To ensure an adequate level of data protection, EU standard contractual clauses have also been concluded as appropriate safeguards pursuant to Art. 46 (2) GDPR.

The group company camLine Pte Ltd, 18 Kaki Bukit Road 3, #04-20 Entrepreneur Business Center Singapore 415978, which is affiliated with us, camLine, is used to support the operation of the camLine e-Learning Platform and to provide the content. The intra-group data transfer is also secured by a contract for commissioned processing according to Art. 28 GDPR. To ensure an adequate level of data protection, EU standard contractual clauses have also been concluded as appropriate safeguards in accordance with Art. 46 (2) GDPR.

As a matter of principle, no further transfer of your data to third parties for purposes other than those listed will take place unless we are legally obliged to do so, or the transfer of data is necessary for the performance of the contractual relationship, or you have previously expressly consented to the transfer of your data.

Deletion of data

Your data collected by us will be stored within the scope of legal obligations and then deleted. In principle, personal data is only stored for as long as is necessary for the aforementioned purposes and legal obligations of proof and retention do not require longer storage. In this

sense, we generally store your data for as long as is necessary for the technical operation of the website and for the use of the camLine e-Learning Platform or to respond to your request. How long we store data about your learning progress is decided by your employer. As a rule, this will be necessary at least for the duration of your employment with your employer.

Cookies

When using the camLine e-Learning Platform, cookies are used. Cookies are files that are stored on your computer by a website that you visit and enable your browser to be reassigned. Cookies can store various information, such as language settings, the duration of your visit to a website or the entries you have made there. This prevents you, for example, from having to re-enter required form data each time you use the site. The information stored in cookies can also be used to recognize preferences and to tailor content according to areas of interest.

There are different types of cookies: session cookies are sets of data that are only temporarily held in memory and deleted when you close your browser. Permanent or persistent cookies are automatically deleted after a specified period of time, which may vary depending on the cookie. With this type of cookie, the information can also be stored in text files on your computer. However, you can also delete these cookies at any time via your browser settings. First-party cookies are set by the website you are currently visiting. Only that website is allowed to read information from these cookies. Third-party cookies are set by organizations that are not operators of the website you are visiting. For example, these cookies are used by marketing companies.

The legal basis for possible processing of personal data using cookies and their storage period may vary. Insofar as you have given us your consent, the legal basis is Art. 6 (1) lit. a GDPR. Insofar as the data processing is based on our legitimate interests, the legal basis is Art. 6 (1) lit. f GDPR. The stated purpose then corresponds to our legitimate interest.

The camLine e-Learning Platform is based on the free learning platform software Moodle and uses cookies to ensure the proper operation of the website, to provide basic functionalities.

camLine uses only the following technically necessary cookies:

Name	Purpose	Legal Basis	Storage Period
MoodleSession (Session Cookie)	Login saving to maintain login when navigating within the platform	Legitimate interest according to Art. 6 Sec. 1 lit. f) GDPR	End of the session

You can delete cookies already stored on your end device at any time. If you want to prevent cookies from being saved, you can do this via the settings in your Internet browser. You can find instructions for common browsers online on the respective provider pages (Microsoft Internet Explorer, Mozilla Firefox, Google Chrome, Google Chrome mobile, Microsoft Edge Browser, Safari, Safari mobile). Alternatively, you can also install so-called ad blockers. Please note that individual functions of the website/platform may not work if you have disabled the use of cookies.

We use the service of Vimeo LLC, 555 West 18th Street, New York, New York 10011, USA ("Vimeo") as part of the camLine e-Learning Platform to play out video content (webinars and product information). These are loaded by Vimeo or transmitted via Vimeo. In the process, data may be transferred from you to Vimeo. With the integration of Vimeo videos, we pursue the purpose of making the platform offers more interesting and attractive for users and to achieve a better presentation of content for the training and user-relevant use of our products.

If you access a page of the camLine e-Learning Platform in which a video is embedded via Vimeo, a connection is normally established to the Vimeo servers and data is sent to servers in the USA, thereby transmitting to the Vimeo server which website you have visited. By using our consent management tool, this is prevented if you have not consented to the data processing with regard to Vimeo. Thus, due to the integration of Vimeo, no data is transferred without your consent.

If you have consented to data processing by Vimeo via the Consent Management Tool, you agree that regardless of whether you have a Vimeo account or not, data about you will be transferred to Vimeo by means of cookies and similar technologies used by Vimeo when you watch a video. This includes, but is not limited to, your IP address, technical info about your browser type, operating system, or very basic device information. If you are logged in to Vimeo at that time, the information about the videos you watch can be assigned to your member account with Vimeo. You can prevent this by logging out of your member account before visiting the platform.

Vimeo is based in the USA and thus in an insecure third country where the level of data protection is lower than in the EU/EEA. To provide the service, Vimeo also uses data centers in the USA. Your data may therefore also be processed on servers in the USA. We would like to point out that according to the opinion of the European Court of Justice, there is currently no adequate level of protection for the transfer of data to the USA. This may be associated with various risks for the legality and security of data processing. In order to ensure an adequate level of data protection, EU standard contractual clauses according to Art. 46 GDPR have been concluded with Vimeo, which are provided by the EU Commission to ensure that their data is processed in accordance with the European data protection standard even if it is transferred to and stored in third countries such as the USA.

The legal basis for the described data processing is your consent, Art. 6 para. 1 lit. a GDPR. You can revoke this consent at any time within our consent management tool with effect for the future.

Further information on Vimeo's data protection is provided by Vimeo under the following link: <https://vimeo.com/privacy>

Data security

We have taken extensive technical and operational precautions to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security procedures are regularly reviewed and adapted to technological progress. In order to fulfill our tasks and ensure the security of our IT infrastructure, we must work with service providers who may also receive personal data for this purpose. These service providers are contractually bound by camLine and may only use personal data they receive in this context for the permitted purpose.

Your rights

You have the right to information (Art. 15 GDPR) and, subject to the respective legal requirements, the right to rectification (Art. 16 GDPR), the right to restriction of processing (Art. 18 GDPR), the right to erasure (Art. 17 GDPR), the right to object (Art. 21 GDPR) and the right to data portability (Art. 20 GDPR).

Instruction on revocation in the case of consent

You can revoke a given consent to the processing of personal data at any time. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected.

Reference to right of objection in case of weighing of interests

Insofar as the processing of your personal data is based on a balance of interests pursuant to Art. 6 (1) lit. f GDPR, you may object to the processing. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as described by us. In the event of your justified objection, we will examine the merits of the case and either discontinue or adapt the data processing or explain to you our compelling reasons worthy of protection.

Complaint to the supervisory authority

You also have the right to lodge a complaint with a supervisory authority, in particular in the member state of your place of residence, your place of work or the place of the alleged infringement, if you are of the opinion that the processing of personal data concerning you violates data protection regulations (Art. 77 GDPR).

Your rights must generally be asserted against your employer as the data controller. If you assert your rights against us, we are legally and contractually obligated to forward your request to your employer and to support your employer in granting your rights.

Data Protection Officer

If you have any questions regarding the processing of your personal data, you can contact our data protection officer directly, who is also available in the event of requests for information, applications or complaints:

camLine GmbH
Data Protection Officer
Fraunhoferring 9
85238 Petershausen
E-mail: privacy@camline.com