

Privacy policy – EasyCarWash App

This privacy policy should inform you about how the data made available by you as part of the use of the EasyCarWash app are processed. In particular, these data can also be personal data, if they pertain to an identified or identifiable natural person.

I. Controllers

In connection with the use of the EasyCarWash app, your data will be processed by two different controllers:

- A. Local Subsidiary of WashTec (“WashTec”),**
- B. the facility operator, as specified in the imprint of the respective sub-area of the washing facility operator (the “Facility Operator”)**

(each individually, a “Controller”).

Both Controllers are not so-called joint Controllers for the data processing within the meaning of the Data Protection Regulation or of the respectively applicable data protection law, because they do not jointly establish the purposes and means of the processing. Rather, WashTec, as provider, makes the EasyCarWash app available to you and is responsible for the data processing connected with the general use of the EasyCarWash app, whereas the Facility Operator offers you services in its own sub-areas of the EasyCarWash app (e.g., booking a car to be washed) and is responsible for the data processing in connection with the use of these sub-areas.

Please observe that concerning the use of data, the Facility Operator may provide further notices that will take precedence over this privacy policy.

II. Categories of data; processing purposes

A. Metadata

In principle, you can use the EasyCarWash app without actively making personal data available to WashTec or to the Facility Operator. If you do so, however, WashTec as Controller can still collect, process, and use certain metadata. Metadata consist of information which, in the course of the use of the EasyCarWash app, are automatically generated in order to display the content of the EasyCarWash app to you, e.g.:

- IP address,
- retrieval of different areas in the EasyCarWash app,
- date and time of the retrieval.

These data are used by WashTec for the purpose of enabling a data exchange connected with the use of the EasyCarWash app. Beyond that, these data are used by

WashTec in order to guarantee the security of the EasyCarWash app and in order to recognize technical errors and/or deviations in the transmission of the data exchange.

The metadata are not made available to the Facility Operators.

B. Core data, contact data, payment data, and additional data

If you register at a Facility Operator over the EasyCarWash app, book a car wash or otherwise contact the Facility Operator, then the Facility Operator can, for example, collect, process, and use the following core data about you:

- salutation, name, date of birth, company name, address;

- telephone number, mobile telephone number, e-mail address;
- mode of payment, bank account information, payment intervals, information in invoices, information about services booked;
- vehicle license plates, selected car wash facilities, client groups, client status, SMS verification status, content of communications, interests.

These data are used by the Facility Operator for the purpose of offering you the corresponding services over the EasyCarWash app, and effectuating the provision of the selected services to you. Some of your data will be required so that you can identify yourself to the Facility Operator in the EasyCarWash app, book car washes at the Facility Operator, or so that you can have car washes done at the Facility Operator. Above and beyond that, your data will be used so that the Facility Operator can bill the services to you. Furthermore, the Facility Operator shall be able to process your data in order to protect itself from fraudulent actions. For example, your car license plate will be recorded and processed before the wash process to identify you and prevent misuse of your booked wash.

Also, the Facility Operator shall be able to use your data for direct marketing purposes (e.g., making personalized advertising available, sending advertising via e-mail). To the extent necessary, the Facility Operator shall obtain consent from you and make further information available to you.

For these data, each Facility Operator shall be the Controller within the meaning of German law governing data protection. However, these data shall be saved by WashTec as processor of the Facility Operator.

III. Engaging third parties

A. Processor

The Facility Operator and WashTec shall be able to engage external service providers, who shall work as processors for WashTec or the Facility Operator and who shall process your data on behalf of the Facility Operator or of WashTec. In this manner, for example, the Facility Operator engages WashTec as the service provider, in order to offer you services over the EasyCarWash app. WashTec itself sources the access to the EasyCarWash Platform and its related services from WashTec Cleaning Technology GmbH, Argonstraße 7, 86153 Augsburg, Germany. Additional processors who can be engaged by the Facility Operator and/or by WashTec, are, e.g., the marketing service provider, the IT service provider (for hosting or support) or payment service providers.

B. Payment Service Provider

For the processing of payments the Facility Operator uses the online payment service provider Stripe Payments („Stripe“). Parts of your master data, e.g. your name, information about payment type as well as bank account information will be transferred

from the Facility Operator to Stripe to process payments.

C. Additional recipients

The Facility Operator and WashTec shall be able – in accordance with applicable law – to transmit your data to public authorities, legal counsel, external advisors, or business partners who shall process these data for their own purposes. Besides that, the Facility Operator shall, in particular, be able to provide the data designated under II. A., which data WashTec shall be able to use for its own purposes (e.g., in order to further develop WashTec's products or services, to anonymize and to share these data with WashTec business partners). Also, in the event of purchases of the business or other business transactions, data will be transmitted to third parties who are involved in such purchases of the business or business transactions.

D. International transmission of personal data

Some of the aforementioned recipients (e.g., some IT service providers) are located in so-called third countries. 'Third countries' are countries that are not Member States of the European Union or of the European Economic Area. Generally, such third countries do not offer the same level of data protection which applies in the European Union or in the European Economic Area. However, there are third countries into which your personal data can be transmitted, which countries the European Commission has concluded offer an appropriate level of data protection, e.g., New Zealand or Canada (with certain restrictions), the United States of America (if the recipient satisfies additional requirements). You can find a complete list and additional information here:

http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm.

Beyond that, your personal data shall also be able to be transmitted to countries in which there is no appropriate level of data protection (e.g., if there is no decision of the European Commission as to appropriateness for these countries). In this event, the necessary measures shall be taken, to the extent necessary, to introduce suitable guarantees for the protection of personal data. Such guarantees can be, for example, standard data protection clauses issued or approved by the European Commission, approved codes of conduct, or certification mechanisms with legally binding and enforceable obligations or binding, internal data protection regulations (binding corporate rules). You can receive copies of these guarantees by contacting the Facility Operator or WashTec as specified below.

IV. Legal basis for the processing

The processing of your personal data can be grounded in the following legal basis:

- the processing is necessary in order to make the EasyCarWash app – including the transmission of communications – available to you as you wish;
- the transmission is necessary in order to receive or to restore the security of the EasyCarWash app or to recognize technical errors in the transmission of electronic communications;
- you have provided your consent to the processing of the personal data concerning you for one or several particular purposes;
- the processing is necessary to fulfill a contract to which you are a contracting party, or to carry out pre-contractual measures that are effected upon your inquiry;
- the processing is necessary to fulfill a legal obligation to which the Facility Operator or WashTec is subject;
- the processing is necessary to safeguard the justified interests of the Facility Operator or of WashTec or of a third party, insofar as your interests or fundamental rights and freedoms requiring the protection of personal data do not preponderate – the interests of the Facility Operator or of WashTec or of a third party are to be found in the processing purposes set forth under II.

It is necessary that you make certain personal data available so that the Facility Operator can verify you in the EasyCarWash app and that you can book any service – and in this regard, enter into a contract with the Facility Operator. If you do not furnish your personal data, then as a consequence the Facility Operator cannot extensively make its services available to you (i.e., it is possible that you will not be able to book any car washes over the EasyCarWash app).

V. Your rights as a natural person

If you provide your consent, then you can revoke your consent at any time. Doing so will not affect the legitimacy of the data processing that takes place based on your consent up to the revocation. Beyond that, you can object to the use of your personal data for the purpose of direct advertising without any transmission costs arising for such, other than those under the basic rates.

Under the applicable data protection law, you have the right to demand (A) access, (B) rectification, (C) erasure, (D) restriction of the processing, and (E) transfer of your personal data, as well as (F) to object to the processing of your data (including profiling, and other rights with regard to automated decision-making).

Please observe that the aforementioned rights can be restricted by national data protection law. Below, you will find information concerning your rights, to the extent that the data protection regulation is applicable:

A. Right of access

You have, where applicable, the right to obtain from the Controller confirmation as to whether or not your personal data are being processed, and to the extent that such is the case, you have a right to access to the personal data. The details of the information shall contain – among other things – the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients, to whom the personal data have been or will be disclosed.

You have, where applicable, the right to receive a copy of the personal data undergoing processing. For any further copies that you request, the Controller may charge a reasonable fee based on administrative expenses.

B. Right to rectification

You have, as applicable, the right to obtain from the Controller without undue delay the rectification of inaccurate personal data about you. Taking into account the purposes of the processing, you have, as applicable, the right demand to have incomplete personal data completed, including by means of providing a supplementary statement.

C. Right to erasure (right to be forgotten)

In some cases, you will have the right to obtain from the Controller the erasure of your personal data without undue delay, and the Controller shall have the obligation to erase these personal data without undue delay.

D. Right to restriction of processing

In some cases, you will have the right to obtain from the Controller restriction of processing. In such a case, your personal data will be marked and may be processed only for certain purposes.

E. Right to data portability

In some cases, you will have the right to receive your personal data, which you have provided to the Controller, in a structured, commonly used, and machine-readable

format, and furthermore you shall have, as applicable, the right to have these data transmitted to another Controller without hindrance from the Controller to which the personal data have been provided.

F. Right to object and rights with regard to automated decision-making in the individual case

In some cases, you will have the right, to object, on grounds relating to your particular situation, at any time to the processing (including profiling) of your personal data, and the Controller shall be obligated, as applicable, not to process your personal data any further.

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case, the personal data shall no longer be processed for such purposes.

Furthermore, in some cases of automated decision-making, you will have the right, in the individual case, the right to obtain human intervention on the part of the Controller, to express his or her point of view and to contest the decision.

To exercise your rights, please contact the relevant Controller as specified

below. Apart from such, you have the right to file a complaint with a supervisory authority.

VI. Google Analytics

The EasyCarWash app uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses data that are placed on the end devices of the users and which enable an analysis of the use of the EasyCarWash app by the users. The information generated about the use of the EasyCarWash app by the users will generally be transmitted to and stored by Google on a server in the United States. In the EasyCarWash app, IP anonymization has been activated, so that IP addresses of users of Google within the Member States of the European Union or in other parties to the Agreement on the European Economic Area will be truncated in advance. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and be truncated there. On behalf of WashTec, Google will use this information for the purpose of evaluating the use of the website by the users, compiling reports on the EasyCarWash app, and providing other services to WashTec relating to the use of the EasyCarWash app and the internet. The IP address transmitted by your browser within the scope of Google Analytics will not be associated with any other data held by Google.

VII. Storage duration of personal data

Your data will be retained as long as is necessary to make the services available to you – e.g., the EasyCarWash app from WashTec or the opportunity to book car washes at the Facility Operators. If the relationship between you and WashTec and/or the Facility Operator ends (e.g., with the erasure of your account), then the respective Controller shall erase or anonymize your data, to the extent that a retention is not necessary (i) due to the purposes pursued (e.g., if you have furnished a consent for direct advertising or storage of personal data is necessary to assert or defend against any legal claims) or (ii) due to statutory retention periods. For example, there arise in the tax code and in the commercial code duties to retain certain documents – which can contain personal data about you – for up to six (6) years (e.g., for commercial or business letters or other documents having commercial and tax significance) or ten (10) years (e.g., for booking receipts). The retention period shall commence with the end of the calendar year in which the document was generated, and shall end, after expiration of the notice period, upon the end of the calendar year.

VIII. Contact and data protection

You can contact the Controller as follows concerning any inquiries about data protection:

A. WashTec

For WashTec as provider of the EasyCarWash app and the data processing connected therewith: WashTec Cleaning Technology GmbH

Argonstr. 7

86153

Augsburg

Deutschland

Telephone: +49 821

43709316 E-mail:

washtec@washtec.de

Contact data of the WashTec data protection officer: For address, see above

E-Mail: datenschutzbeauftragter@washtec.de

Or by Post Mail to:

WashTec
Datenschutzbeauftragter
ter Argonstr. 7
86153 Augsburg

B. Facility Operator

Contact information of the Facility Operator – who is responsible for the services offered to you over the EasyCarWash app (e.g., booking car washes), and the data processing in connection therewith – and, as applicable, the contact data of the data protection officer – can be found in the imprint of the respective wash facility.