

# Privacy Statement

## Website and Fan Pages

CCP Austria Abwicklungsstelle für Börsengeschäfte GmbH (hereinafter referred to as "CCPA") takes the protection of your personal data very seriously and takes this into account in all business processes. We therefore process your personal data in accordance with the statutory data protection regulations, in particular the General Data Protection Regulation ("GDPR")<sup>1</sup> and the Austrian Data Protection Act ("DPA").

In this privacy statement, we would like to inform you about the nature, scope and purposes of the processing and use of your personal data by CCPA in connection with your visit to the CCPA website ([www.ccpa.at](http://www.ccpa.at)) and the CCPA fan pages.

Please note that the CCPA website may contain links to websites of other companies which are not covered by this privacy statement.

## 1 Controller

The controller within the meaning of the GDPR and the DPA is CCPA.

Address: Strauchgasse 1-3, 1010 Vienna

Tel: +43 1 533 22 44 2887

Email: [office@ccpa.at](mailto:office@ccpa.at)

Website: <https://www.ccpa.at/>

## 2 Personal data

Personal data is any information relating to an identified or identifiable natural person (so-called "data subject"). Examples include name, address, email address, IP address, telephone number, date of birth, age, gender or national insurance number. There are also special categories of personal data (so-called "sensitive data"). The GDPR defines this as, for example, health data or data in connection with criminal proceedings. The processing of personal data (e. g. the collection, retrieval, use, storage, or transfer) always requires a legal basis or your consent.

## 3 Data processing on our website

**Scope and purpose of data processing:** We collect and process your personal data only insofar as this is necessary to provide a functional website and our content and services or information. When you access and use our website, we only collect access data, such as the name of the requested file, date and time of access, IP address, amount of data transferred and the requesting provider, which your browser automatically transmits to our server. This information is temporarily stored in a so-called log file. This data is analysed to ensure the trouble-free operation of our website and to improve our offer, which is also our legitimate interest in accordance with Art 6 (1) lit. f GDPR.

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<sup>1</sup> Regulation (EU) 2016/679.

**Data processing when contacting us:** If you contact CCPA by email, telephone, the website or otherwise (e.g., via fan pages), the data required to respond to your enquiry will be processed (legal basis: Art 6 (1) lit. a), b) and f) GDPR). This includes in particular:

- ♦ First name and surname
- ♦ Email address and/or telephone number
- ♦ Applicant data and related data disclosed by you, if applicable
- ♦ other personal data provided by you, if applicable as shown in the respective input forms (e.g., complaint form)

The provision of the above-mentioned personal data serves the purpose of processing your enquiry. If you do not wish to disclose any personal data to CCPA, CCPA cannot establish a business relationship with you or respond to enquiries.

## 4 Automated decision-making in accordance with Art 22 GDPR

CCPA does not use automated decision-making in accordance with Art 22 GDPR.

## 5 Legal basis for data processing

CCPA collects and processes your personal data only if a legal basis within the meaning of Art 6 (1) GDPR is fulfilled. Your data is processed in particular based on the following legal bases:

### 5.1 Consent - Art 6 (1) lit. a) GDPR

This data is processed on the basis of your consent, provided that you explicitly give it. Sensitive data (within the meaning of Art 9 GDPR) that you may disclose to CCPA will also be processed on the basis of consent. The scope and purposes of the processing depend on the underlying declaration of consent. You can revoke your consent at any time with effect for the future by notifying CCPA of the revocation by telephone on +43 1 533 22 44 2887, by email to [office@ccpa.at](mailto:office@ccpa.at) or by post to CCPA, Strauchgasse 1-3, 1010 Vienna, Austria.

### 5.2 For the fulfilment of a contract – Art 6 (1) lit. b) GDPR

All processing that CCPA carries out in connection with the fulfilment of a contract is based on the legal basis of Art 6 (1) lit. b) GDPR. This also includes data that CCPA processes on the basis of pre-contractual obligations.

### 5.3 Legal obligations – Art 6 (1) lit. c) GDPR

If CCPA is subject to a legal obligation that requires the processing of personal data, Art 6 (1) lit. c) GDPR serves as the legal basis. This includes, for example, processing obligations under EMIR and retention obligations under tax or company law.

## 5.4 Legitimate interest – Art 6 (1) lit. f) GDPR

If the processing of personal data is necessary to safeguard a legitimate interest of CCPA or a third party, Art 6 (1) lit. f) GDPR serves as the legal basis. A legitimate interest of CCPA is in particular:

- (i) to ensure the operation and management of the CCPA systems, website and fan pages;
- (ii) to be able to conduct direct marketing and report on events at CCPA;
- (iii) to ensure network and data security, but only to the extent that our legitimate interest is consistent with applicable law and the rights and freedoms of data subjects;
- (iv) to assert, exercise or defend legal claims.

## 6 Disclosure of your personal data to third parties

Due to the current complexity of certain data processing procedures, it has become essential to provide certain services with the assistance of third parties. For this purpose, CCPA uses external service providers, e.g., for web hosting and IT systems, to whom your data is made available for this purpose. These service providers are processors within the meaning of Art 28 GDPR, who are contractually obliged to treat your data confidentially and to process your data only within the scope of their service provision. These processors include the following in particular:

- ♦ Web host: Wiener Börse AG. You can find relevant data protection information at <https://www.wienerborse.at/rechtliches/datenschutz/>.

The potential recipient of your personal data may be located outside the European Union or may process your personal data there. The level of data protection in other countries may not be the same as in Austria. However, CCPA will only transfer your personal data to countries that have an adequate level of data protection according to the EU Commission. Alternatively, CCPA takes measures to ensure that all recipients have an adequate level of data protection, such as the conclusion of agreements within the meaning of the standard contractual clauses (Implementing Decision (EU) 2021/914).

Under certain circumstances, CCPA may be legally obliged to disclose your data to, for example, supervisory authorities and law enforcement agencies. However, this is only to the extent necessary to prevent and/or detect fraud and other criminal offences or to ensure network and data security.

## 7 Cookies

CCPA uses cookies on the website. For more information: <https://www.ccpa.at/en/cookie-policy/>.

## 8 LinkedIn fan page

CCPA has a fan page on LinkedIn. This fan page is the company's user account for contacting users on LinkedIn. Fan page operators can use the "LinkedIn Insight" function. This compiles anonymised statistical data about visitors to the fan page. LinkedIn collects this data by setting cookies. Personal data is therefore processed each time this fan page is visited. This data is also processed if you are not logged in/registered on LinkedIn. As the operator of the fan page, CCPA is therefore jointly responsible with LinkedIn within the meaning of Art 26 GDPR.

**Registered users:** As part of the registration process with LinkedIn, you agree to the terms of use or privacy and cookie policy. CCPA has no influence on these. If you visit the CCPA fan page as a registered user, your data will be collected and processed as set out in these terms and conditions.

**Non-registered users:** By accessing a subpage of the fan page, you consent to the processing of your personal data by LinkedIn (Art 6 (1) lit. a) GDPR). The personal data is stored by LinkedIn and only passed on to CCPA in anonymised form for statistical evaluations.

The information to whom (as recipients) your personal data is transmitted can be found specifically in LinkedIn's Privacy Policy (<https://www.linkedin.com/legal/privacy-policy>) and Cookie Policy (<https://www.linkedin.com/legal/cookie-policy>).

Categories of data that CCPA receives from LinkedIn in anonymous form:

- ◆ Statistics about members, their profession or industry
- ◆ Calculation of adverts placed or clicked on
- ◆ Visitor demographics
- ◆ further Insight functions can be found in LinkedIn's Privacy Policy and Cookies Policy linked above.

If you have consented to the processing of your data, you have the right to revoke this consent at any time, but this does not affect the lawful data processing that has taken place up to that point. When exercising your rights as a data subject and when withdrawing your consent, please refer to the LinkedIn user agreement ([https://de.linkedin.com/legal/user-agreement?trk=homepage-basic\\_footer-user-agreement](https://de.linkedin.com/legal/user-agreement?trk=homepage-basic_footer-user-agreement)) and the forms contained/linked therein. Alternatively, you can contact LinkedIn Ireland Unlimited Company ("LinkedIn Ireland"), Wilton Place, Dublin 2, Ireland, by post with your requests.

## 9 Storage of your data and data security

Appropriate organisational and technical precautions are taken to protect your personal data. These precautions relate in particular to protection against unauthorised, unlawful or even accidental access, processing, loss, use and manipulation of your personal data. Notwithstanding our endeavours to maintain an appropriately high level of due diligence at all times, it cannot be ruled out that information that you disclose to CCPA via the Internet may be viewed and used by other persons. Please note that we therefore accept no liability whatsoever for the disclosure of information due to errors in data transmission not caused by CCPA and/or unauthorised access by third parties (e.g., cyber-attacks).

Your personal data will be processed as long as this is necessary to fulfil contractual or legal obligations (such as corporate retention obligations), to defend against any liability claims and for the duration of the declaration of consent. Thereafter, data is deleted or anonymised in such a way that it can no longer be linked to a specific person. CCPA ensures that your personal data is treated in accordance with this privacy statement for the entire period.

CCPA deletes contact data six months after contact is made, provided that no contractual relationship or declaration of consent is subsequently established.

Data is stored for the duration of the entire business relationship and beyond in accordance with the statutory retention and documentation obligations. These result from, among other things:

- ◆ Federal Fiscal Code (BAO)

- ◆ Regulation (EU) No. 648/2012 on OTC derivatives, central counterparties, and trade repositories (EMIR)
- ◆ Stock Exchange Act 2018 (BörseG 2018)
- ◆ Austrian Commercial Code (UGB)

Our declared aim is to take all necessary technical and organisational measures to ensure the security of data processing and to process your personal data in such a way that it is protected against access by unauthorised persons. In addition, we improve the security of your data by using risk-minimising measures and preventive safeguards.

## 10 Your data protection rights

As a data subject under the GDPR, you have the following rights, among others: the right of access to your stored personal data and information about its origin, recipients, and the purpose of data processing. You also have the right to rectify inaccurate personal data and to have incomplete personal data completed by CCPA, as well as to have your personal data deleted and to restrict the processing of your personal data. You may also request that your personal data provided to CCPA be made available to you in a structured, commonly used and machine-readable format or that it be transferred to another controller.

When processing your personal data on the basis of legitimate interests pursuant to Art 6 (1) sentence 1 lit. f) GDPR, you have the right to object to the processing of your personal data pursuant to Art 21 GDPR, provided that there are reasons for this arising from your particular situation.

Any questions or requests for information, deletion, correction, objection and/or data transfer can be sent to the email address [office@ccpa.at](mailto:office@ccpa.at) or by post to the following address: CCP Austria Abwicklungsstelle für Börsengeschäfte GmbH, Strauchgasse 1-3, 1010 Vienna, Austria.

If you are of the opinion that the processing of your personal data by CCPA violates the applicable data protection law or your data protection claims have been violated in any other way, you have the option of complaining to the competent supervisory authority. In Austria, the data protection authority ([www.dsb.gv.at](http://www.dsb.gv.at)) is responsible for this.

## 11 Changes to the privacy statement

CCPA reserves the right to adapt this privacy statement, if necessary, for example due to technical developments or legal changes, or to update it in connection with the offer of new services or products. The updated privacy statement will be published on the website <https://www.ccpa.at>. We therefore ask you to check the relevant page regularly.

Current status: May 2024