

As the person whose personal data is processed, you are a data subject. In the following, we would like to inform you about the processing of your personal data and provide you an overview of the rights related thereto.

We process your personal data exclusively in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act [*Bundesdatenschutzgesetz, BDSG*]. Furthermore, we do not process more data than absolutely necessary and in an anonymous manner, if possible.

### 1. Who is the controller and whom may I contact?

We – VNG Gasspeicher GmbH – process your personal data and, for that reason, are the controller. You may contact us using the following contact details:

VNG Gasspeicher GmbH  
Maximilianallee 2  
04129 Leipzig, Germany

Telephone: + 49 341 443-5353  
Fax +49 341 443-5354  
E-mail: [info@vng-gasspeicher.de](mailto:info@vng-gasspeicher.de)

If you have questions regarding the foregoing information, you may contact our Data Protection Officer using the following contact details:

Kevin Peter  
Corinthstr. 19  
04157 Leipzig, Germany

E-mail: [datenschutz@vng-gasspeicher.de](mailto:datenschutz@vng-gasspeicher.de)  
Telephone: +49 800 6300 3061

### 2. From which sources do we obtain this data?

We process personal data that you provide to us within the scope of our marketing procedure.

If necessary, we furthermore process data that we obtain from publicly accessible sources.

### 3. Why do we process your data and on which legal basis?

There are several bases for the processing of your personal data:

- Your personal data is processed on the basis of your consent. Your data is processed exclusively within the scope of the granted consent and only for the purposes to which you have consented.

- We need to process your data in order to fulfil our contractual and extra-contractual obligations in relation to you. The data is processed for the purpose of performing the relevant contract or implementing pre-contractual measures.
- If necessary, we process your personal data, beyond the actual fulfilment of contractual or legal obligations, for safeguarding our or third parties' legitimate interests. This includes for example internal statistical purposes or asserting legal claims and the defence in legal disputes.

### 4. Who will receive your data?

In principle, your data will only be processed internally. Within our company, your data will be accessed by those bodies/persons that require it for fulfilling our statutory and contractual obligations.

Furthermore, service providers retained by us (especially processors) and performing agents [*Erfüllungsgehilfen*] will have access to your personal data. These are particularly IT service providers or other external service providers that we include for the purpose of fulfilling statutory and contractual obligations. Such data transfers take place on the basis of legitimate interests or for performing concluded contracts.

Your data will not be sold or marketed in any other way.

### 5. How long will your data be stored?

We will process and store your personal data only as long as the knowledge of this data is required for the purposes for which it was collected or until the expiration of statutory or contractual retention periods.

If the purpose underlying the data collection has been fulfilled, the data will usually be deleted, unless its temporary further processing is necessary. Examples for this are the compliance with retention periods under commercial and tax law (German Commercial Code [*Handelsgesetzbuch*], German Fiscal Code [*Abgabenordnung*], German Anti-Money Laundering Law [*Geldwäschegesetz*] – retention of up to 10 years) as well as the preservation of evidence within the scope of the provisions of the statute of limitations (up to 30 years – the usual limitation period amounts to three years).

### 6. Which rights do you have as data subject?

As data subject, you are entitled to several rights:

- the right of access (Article 15 of the GDPR);
- the right to rectification (Article 16 of the GDPR);
- the right to erasure (Article 17 of the GDPR);
- the right to the restriction of the processing (Article 18 of the GDPR);
- the right to data portability (Article 20 of the GDPR);
- the right to object (Article 21 of the GDPR);
- the right to withdraw a granted consent (Article 7, subsection 3 of the GDPR);
- the right to lodge a complaint with a supervisory authority (Article 77 of the GDPR).

Your rights are subject to several legal exceptions. For example, your rights are limited due to research and statistical purposes (Section 27, subsection 2 of the German Federal Data Protection Act) or due to archiving purposes in the public interest (Section 28, subsections 2 and 3 of the German Federal Data Protection Act). Other exceptions are e.g. contained in Sections 34 and 35 of the German Federal Data Protection Act and Article 17, subsection 3 of the GDPR.

Please find detailed information on your right to object in accordance with Article 21 of the GDPR at the end of this document in the section "Your Rights to Object".

In the case that your personal data has been collected on the basis of your consent, you furthermore have the right to revoke this consent in relation to us at any time. In that context, however, you need to be aware of the fact that such a revocation has an effect only for the future and any processing performed until that date will remain lawful.

### 7. Are you obliged to provide us with your personal data?

Within the scope of our business relationship, you are required to provide the personal data that is necessary for initiating and performing the business relationship and fulfilling the contractual obligations related thereto or the personal data to the collection of which we are obliged by law.

Without this data, we are unable to conclude the relevant contract.

### 8. Is there any automated decision-making?

In principle, we do not perform any automated decision-making. If we should use such a procedure in some exceptional cases, we will

inform you separately prior to this, if this is required by law.

### 9. Information in the case of the change of purpose

If there will be a change regarding the reason for the processing of your personal data, of course we will inform you immediately.

#### YOUR RIGHTS TO OBJECT

##### 1. Right to object in individual cases

We have already informed you of the right to object in accordance with Article 21 of the GDPR. If we process (i) data on the basis of a weighing of interests for safeguarding our legitimate interests or (ii) in the public interest (cf. Article 6, subsection 1, items e and f of the GDPR), you are entitled to object at any time to the processing of your personal data for reasons that arise from your specific situation. This also applies to a corresponding profiling.

If you object to the processing of your personal data, we will no longer process it, unless we may prove that there are compelling reasons for the processing that are worth being protected and that override your interests, rights and freedoms or if the processing serves for asserting, exercising or defending legal claims.

##### 2. Right to object against the processing for purposes of direct marketing

In accordance with Article 21, subsection 2 of the GDPR, you as data subject in addition have a separate right to object for the case that your personal data is used for direct marketing. This shall also apply to the profiling if it is related to direct marketing.

If you exercise this right to object, we as controller will no longer process your personal data for that purpose.

##### 3. Who is the addressee of the objection?

The objection shall not be required to be made in any specific form and shall, if possible, be directed to:

VNG Gasspeicher GmbH  
Datenschutzbeauftragter  
Maximilianallee 2  
04129 Leipzig, Germany

E-mail: [datenschutz@vng-gasspeicher.de](mailto:datenschutz@vng-gasspeicher.de)