



Data Privacy Declaration of GfA ELEKTROMATEN GmbH & Co. KG for the use of the GfA website

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1 General

GfA ELEKTROMATEN GmbH & Co. KG (hereinafter referred to as "GfA" or "we") outlines in this Privacy Policy which personal data is collected by GfA during your visit to our GfA website, when using our IoT portal evodo, and when utilizing our app-based solutions, how we use such data, and what rights you have with regard to this data.

Our Privacy Policy is further supplemented, modified, or replaced in detail by additional terms and conditions, such as those governing the purchase of products via the evodo web platform, and by our General Terms and Conditions of Sale and Delivery.

In case of any question you may have with regard to our Privacy Policy please send an e-mail to:

datenschutz@gfa-elektromaten.de

or via regular mail to:

GfA ELEKTROMATEN GmbH & Co. KG,
Datenschutzbeauftragter, Wiesenstr. 81, 40549 Düsseldorf,
Germany.

2 Contact person, responsible body

The responsible body for the collection and processing of your personal data is

GfA ELEKTROMATEN GmbH & Co. KG,
Wiesenstraße 81, 40549 Düsseldorf. Germany

3 Definition of personal data

This is all information relating to an identified or identifiable natural person. An identifiable natural person is a natural person who can be identified directly or indirectly, in particular by assignment to an identifier such as a name, identification number, location data, an online identifier or one or more special characteristics that express the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

4. evodo web platform

We operate the IoT platform "evodo" (a web-based application), which is accessible either via our GfA website or directly at <https://evodo.eu>. During the registration process, you may choose between two versions with differing scopes of functionality: a) the evodo Stick App and b) the evodo Plus Version.

The specific scope of services for each version is set out in GfA's "Service Information – evodo web platform." The collection and use of personal data for both versions is described in detail below.

4.1. Collection and Use of Personal Data in Connection with the Download and Use of the evodo Stick App Version

GfA provides the evodo Stick App free of charge via the Apple App Store or Google Play Store. The purpose of the evodo Stick App is to facilitate ongoing maintenance, troubleshooting, and repair of existing door drive systems by enabling faster and improved transmission of technical data, as well as by providing written or telephone-based support from GfA. These are GfA service offerings.

For this purpose, the app provided by GfA allows users, via a GfA-Stick supplied by GfA, to read data from interfaces on door control units – such as serial numbers and technical status – and to transmit such data to GfA's IoT platform evodo. The status data includes technical specifications as well as operational control processes of the door system. Optionally, users may also specify a reason for the data retrieval and a reference number. The location of the door system is determined by accessing the GPS data of the user's mobile device and is displayed in an editable format.

No user-specific data (such as name, phone number, email address, or default language settings) is collected during the

download of the evodo Stick App. Instead, a device-specific, anonymized identification number is generated in order to enable the provision of the intended GfA services. This allows us to take customer-specific standards into account as part of the designated services.

To provide the aforementioned GfA services and to process the retrieved data, the evodo Stick App accesses and stores the identification number generated during the app download, the selected language, and the extracted door control data including location information.

The door control data set includes the following additional information: Date of data collection; app version, unique device identifier (device-specific anonymized ID); Information entered in the prior form (reason for data retrieval, installation location); location data (if access to location services has been granted).

4.2. Collection and Use of Personal Data in Connection with the evodo Plus Version

If you have registered on the evodo web platform and subscribed to the evodo Plus Version (which includes, among other things, a door control system with an IoT data interface), you will be granted access to a closed and protected area of the evodo web portal. During the registration process, we store personal data such as your first and last name, contact person, customer number, address details, gate locations, and, where applicable, building information.

In the course of using the evodo web portal, the gateway is linked to the collection and use of personal data associated with your user account. The evodo Plus Version includes, among other features, the ability to perform remote diagnostics and remote monitoring of your door systems. You will also receive a complete overview of all events and errors, including notifications of malfunctions, extended door opening times, and unauthorized door movements occurring outside of defined business hours, each marked with a time stamp.

4.3. Ordering Goods via the evodo web platform

The evodo web platform offers the possibility to place orders. This option is available exclusively to business customers who have obtained services via the GfA service platform and is not intended for consumers. Sections 312 to 312k of the German Civil Code (BGB) do not apply.

For the execution of an order, the collection, storage, and processing of personal data is essential for the performance of the contractual relationship. In the course of placing an order, the following data, among others, will be collected: salutation, first name, last name, telephone number, company address, and email address. If a delivery address differing from the billing address is specified, the following additional data will be collected: company name, salutation, first and last name, and address. Furthermore, the selected method of payment, as provided during the ordering process, will also apply.

We require the data collected during the ordering process for the following purposes:

- to identify you as a customer;
- to process and fulfill your order;
- to contact you, for example, in the event of queries, clarification of discrepancies, or to provide other information related to your order;
- for invoicing purposes;
- for potential warranty and liability matters, as well as to assert any claims against you, if necessary;
- to manage our customer records.



By confirming this Privacy Policy as part of the ordering process, you have provided your consent to the processing of your data.

The processing of your data is also based on Article 6(1), sentence 1, lit. b of the General Data Protection Regulation (GDPR), for the aforementioned purposes and to ensure the proper handling of your order.

5 Use of GfA website without registration

Users are free to visit our GfA website any time without having to provide for personal data. To the extent individual functions or services provided by our website require the collection, processing or use of personal data, GfA will notify and inform users about this beforehand.

We will only analyze your application or use of the GfA website without obtaining an explicit prior consent from you in an anonymized and pseudonymized format. This data comprises date and time of using our website, the type of your browser, the browser configuration and system software, the last internet page visited, the amount of transferred data as well as the user's IP address. Your service provider is able to identify, which IP address has been allocated to you at any specific point of time. Since this allows for an indirect identification of the person using the address, GfA only saves an abbreviated (anonymized) status of this address, excluding any personal reference of this address.

6 Legal basis for the processing of personal data

- Insofar as we obtain consent from the data subject for the processing of personal data, Art. 6, para. 1 (a) of the EU General Data Protection Regulation (GDPR) serves as the legal basis.

- When processing personal data required for the performance of a contract to which the data subject is a party, Art. 6, para. 1 (b) GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

- Insofar as the processing of personal data is required to fulfil a legal obligation to which our company is subject, Art. 6, para. 1 (c) GDPR serves as the legal basis.

- In the event that the vital interests of the data subject or another natural person require the processing of personal data, Art. 6, para. 1 (d) GDPR serves as the legal basis.

- If processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the former interest, Art. 6 para. 1 (f) GDPR serves as the legal basis for processing.

7 Data deletion and storage time

The personal data of the person concerned will be deleted or blocked as soon as the purpose of storage ceases to apply. Furthermore, data may be stored if this has been provided for by the European or national legislator in EU regulations, laws or other provisions to which the responsible body is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfillment of a contract.

8 Sharing your data with third parties

Sharing or any other transmission of your collected personal data to third parties takes place exclusively within the scope of the necessities of contract execution. The transfer of your personal data to third parties is limited to the necessary minimum.

In principle your personal data will therefore not be passed on to third parties. However, we reserve the right to pass on your data to third parties in the following cases:

- Insofar as you have given your express consent pursuant to Art. 6 para. 1 (a) GDPR.
- Disclosure is necessary to assert or defend against legal claims (Art. 6 para. 1 sentence 1 (f) GDPR).

- Insofar as we are subject to a legal obligation to pass on data pursuant to Art. 6, para. 1 sentence 1 (c) GDPR.

- For the fulfillment of contractual and pre-contractual obligations (Art. 6, para. 1 sentence 1 (b) GDPR).

9 Data processing through third parties

We work with service providers who process certain data on our behalf. This is done exclusively according to the applicable privacy policy. We have concluded particularly agreements with our service providers on data processing on our behalf that meet the requirements of confidentiality (access control, disconnection control, pseudonymisation), integrity (transfer control, input control) and availability and resilience (availability control, rapid recoverability). Thanks to careful selection and regular monitoring, we ensure that our service providers take all organisational and technical measures necessary to protect your data.

For the purpose of delivering the products ordered through the evodo web platform we transfer the personal data to the logistics provider assigned with the distribution. The logistics provider will only use this data for the purpose of executing the shipping the process.

10 Job applications

We are pleased about your opportunity to participate in our application process. For more information about the application process, please refer to the separate privacy policy for applicants (Recruiting) on the company website at:

https://gfa-elektromaten.com/de-DE/privacy_policy_recruiting.html

11 Right to information, deletion, modification

You have the following rights from us with regard to personal data that concerns you:

11.1 Right to confirmation

Each data subject shall have the right to request confirmation from the responsible body for data processing as to whether personal data concerning him/her is being processed. If a data subject wishes to exercise this right of confirmation, he or she can contact our data protection officer or another employee of the responsible body for data processing at any time.

11.2 Right to information

Any person affected by the processing of personal data has the right to obtain, at any time and free of charge, information from the responsible body for data processing concerning the personal data relating to him/her stored and a copy of this information. If a data subject wishes to exercise this right of correction, he or she can contact our data protection officer at any time.

11.3 Right to correction

You have the right to request from us to correct any incorrect personal data concerning you immediately. Taking into account the purposes of data processing, the data subject has the right to request the completion of incomplete personal data - also by means of a supplementary declaration.

11.4 Right to deletion (right to be forgotten)

Any person affected by the processing of personal data shall have the right to require the responsible body to delete the personal data concerning him/her immediately, provided that one of the following reasons applies and insofar as data processing is not necessary.

The personal data has been collected or otherwise processed for such purposes for which it is no longer necessary.

The data subject withdraws his/her consent on which the processing was based pursuant to Art. 6, para. 1 lit. a GDPR or Art. 9, para. 2 lit. a GDPR, and there is no other legal basis for the processing.

The data subject opposes data processing pursuant to Art. 21, para. 1 GDPR and there are no overriding legitimate

grounds for data processing or the data subject opposes data processing pursuant to Art. 21, para. 2 GDPR.

The personal data has been processed unlawfully. The deletion of the personal data is necessary to fulfil a legal obligation under European Union law or the law of the Member States to which the responsible body is subject or if the personal data was collected in relation to information society services offered pursuant to Art. 8, para. 1 GDPR.

11.5 Right to limitation of data processing

Any person affected by the processing of personal data shall have the right to require the responsible body to limit data processing if one of the following conditions is met:

The data subject disputes the accuracy of the personal data for a period which allows the responsible body to verify the accuracy of the personal data; the data processing is unlawful, the data subject refuses to delete the personal data and instead requests the restriction of use of the personal data; the responsible body no longer needs the personal data for the purposes of data processing, but the data subject needs it to assert, exercise or defend legal claims; the data subject has objections to data processing pursuant to Art. 21, para. 1 GDPR and it has not yet been determined whether the legitimate reasons of the responsible body outweigh those of the person concerned.

11.6 Right to data portability

Any person affected by the processing of personal data has the right to receive personal data concerning him/her in a structured, common and machine-readable format. He/she shall also have the right to transmit such data to another responsible body without obstruction by the responsible body to whom the personal data has been made available, provided that data processing is based on the consent provided for in Art. 6, para. 1 (a) GDPR or Art. 9, para. 2 (a) GDPR or on a contract pursuant to Art. 6, para. 1 (b) GDPR and that data processing is carried out using automated procedures, provided that the processing is not necessary for the performance of a task in the public interest or in the exercise of public authority entrusted to the responsible body.

Furthermore, in exercising his/her right to data portability pursuant to Art. 20, para. 1 GDPR, the data subject has the right that the personal data be transferred directly by a responsible body to another responsible body, provided this is technically feasible and provided that the rights and freedoms of other persons are not affected by this.

11.7 Right to complain

If you believe that data processing is unlawful, you have the right to lodge a complaint with your responsible supervisory authority. For the federal state of North Rhine-Westphalia, the competent supervisory authority is: The State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia, Kavalleriestr. 2-4, 40213 Düsseldorf, Germany.

12 Objection to or revocation of the processing of your data

If you have given your consent to the processing of your data, you can revoke it at any time. Such a revocation affects the legitimacy of processing your personal data after you have given it to us.

If we base the processing of your personal data on the weighing of interests, you may object to data processing. This is the case if data processing is not necessary in particular to fulfil a contract with you, which is described by us in the following description of the functions. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either stop or adjust data processing or point out to you our compelling reasons worthy of protection, on the basis of which we will continue data processing.

Of course, you can object to the processing of your personal data for purposes of advertising and data analysis at any time. You can inform us about your advertising objection us-

ing our contact data, as described under figure 2, and also by e-mail to: datenschutz@gfa-elektromaten.de

13 Cookies

We use cookies on our website. Cookies are small text files that are stored on your device by your browser. They help make our services more user-friendly, efficient, and secure.

We use the following types of cookies:

- Technically necessary cookies: These cookies are essential for you to use our website (e.g., to store your cookie preferences).
- Functional cookies: These cookies enable certain features, such as language settings or the playback of videos.
- Analytics/tracking cookies: These cookies help us better understand user behavior and optimize our website accordingly.
- Marketing cookies: These cookies are used to display advertising tailored to your interests.

The processing of technically necessary cookies is based on Article 6(1) lit. f GDPR (legitimate interest). All other cookies (analytics, marketing, etc.) are only set if you have given your consent in accordance with Article 6(1) lit. a GDPR via our cookie consent tool.

When you first visit our website, we ask for your consent to use non-essential cookies through a cookie consent tool. You can withdraw or modify your consent at any time by clicking the icon located at the bottom left corner of our website.



Cookies are stored for varying durations. Some remain active only for the duration of your session ("session cookies"), while others persist beyond that period ("persistent cookies"). For specific storage durations, please refer to the details provided in our cookie banner or the cookie overview.

We may also cooperate with third-party providers who use cookies as well. For more information, please refer to the respective privacy policies of these providers and to our own Privacy Policy.

You can change your cookie settings at any time via our website or disable cookies entirely in your browser settings. Please note that doing so may limit the functionality of our website.

14 Server log files

The server log files involve anonymous data that is collected when you access our website. This information does not allow any personal conclusions to be drawn about you, but for technical reasons it is indispensable for the delivery and presentation of our content. Furthermore, it is used for our statistics and the constant optimisation of our content. Typical log files include the date and time of access, the amount of data, the browser used for access and its version, the operating system used, the domain name of the provider assigned by you, the page from which you came to our offer (referrer URL) and your IP address. Log files also allow a precise check in case of suspicion of illegal use of our website.

15 Data Transmission to Third Countries

As explained in this privacy policy, we use services from providers that are located in so-called third countries, which are countries whose level of data protection does not match that of the European Union. Where this is the case and the European Commission has not issued an adequacy decision (Art. 45 GDPR) for these countries, we have taken appropriate measures to ensure an adequate level of data protection for any data transfers. These measures include, among others, the European Union's Standard Contractual Clauses or binding internal data protection regulations.



Where this is not possible, we base the data transfer on exceptions under Article 49 GDPR, particularly your explicit consent or the necessity of the transfer for the performance of a contract.

If a transfer to a third country is planned and no adequacy decision or suitable guarantees are in place, it is possible and there is a risk that authorities in the respective third country (e.g., intelligence agencies) may gain access to the transmitted data to collect and analyze it, and that the enforcement of your data subject rights may not be guaranteed. When obtaining your consent through the cookie policy, you will also be informed about this.

16 Use of Matomo analytics service (formerly PIWIK)

This website uses the Matomo web analytics service software (www.matomo.org), a service of InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand, ("Matomo"), to collect and store data based on our legitimate interest for the statistical analysis of user behaviour for optimisation and marketing purposes pursuant to Art. 6, para. 1 (f) GDPR. Pseudonymised user profiles can be created and evaluated from this data for the same purpose. Cookies may be used for this purpose. Cookies are small text files that are stored locally in the cache of the visitor's Internet browser. Cookies facilitate, among other things, the recognition of an Internet browser. The data collected with Matomo technology (including your pseudonymised IP address) is processed on our servers. The information generated by the cookie in the pseudonymous user profile is not used to personally identify the visitor to this website and is not combined with personal data about the bearer of the pseudonym.

If you do not agree to the storage and evaluation of this data from your visit, then you can object to the storage and use at any time with a click of the mouse. In this case, a so-called opt-out cookie is stored in your browser, which means that Matomo does not collect any session data. Please note that the complete deletion of your cookies means that the opt-out cookie will also be deleted and that you may have to activate it again.

Your visit to this website is currently recorded by Matomo web analytics. Click [here](#) so that your visit is no longer recorded.

The Matomo program is an open source project. You can get information on data privacy from the third-party provider at <https://matomo.org/privacy-policy/>

17 YouTube with enhanced privacy

This website embeds videos from YouTube. The operator of the web pages is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. We use YouTube in the extended privacy mode. According to YouTube, this mode means that YouTube does not store any information about visitors to this website before they watch the video. However, the extended privacy mode does not necessarily exclude the disclosure of data to YouTube partners. This means that - regardless of whether you watch a video - YouTube establishes a connection to the Google DoubleClick network. As soon as you start a YouTube video on this website, a connection to YouTube's servers is established. This tells the YouTube server which of our web pages you have visited. If you are logged into your YouTube account, you enable YouTube to associate your browsing behaviour directly with your personal profile. You can prevent this by logging out of your YouTube account. Furthermore, after starting a video YouTube may store various cookies on your terminal device or use comparable identification techniques (e.g. device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to collect video statistics, improve the user experience and prevent fraud attempts. In some cases, further data processing operations may be triggered upon starting a YouTube video, over which we have no control. The use of YouTube is in the interest of providing an appealing presentation of our

online offerings. This constitutes a legitimate interest within the meaning of Article 6(1) lit. f GDPR. Where consent has been requested, the processing is carried out solely on the basis of Article 6(1) lit. a GDPR and Section 25(1) of the German Telecommunications and Telemedia Data Protection Act (TDDDG), insofar as the consent includes the storage of cookies or access to information on the user's device (e.g., device fingerprinting) within the meaning of the TDDDG. Consent may be withdrawn at any time.

For more information about privacy on YouTube, please see their privacy policy at:

<https://policies.google.com/privacy?hl=en> .

Your data may be transferred to the USA. For the USA, there is an adequacy decision by the EU Commission, the Trans-Atlantic Data Privacy Framework (TADPF). YouTube is a subsidiary of Google LLC, based in San Bruno, California. Google is certified under the TADPF and is therefore committed to adhering to European data protection principles.

18 Newsletter

If you wish to receive the newsletter offered on the website, we need an email address from you, as well as information that allows us to verify that you are the owner of the provided email address and that you agree to receive the newsletter. No additional data will be collected, except on a voluntary basis. We use this data solely for sending the requested information and do not share it with third parties.

The processing of data entered into the newsletter registration form is based solely on your consent (Art. 6 para. 1 lit. a GDPR). You can withdraw your consent to the storage of the data, the email address, and its use for sending the newsletter at any time, for example, via the "unsubscribe" link in the newsletter. The legality of the data processing carried out prior to the withdrawal remains unaffected.

The data you provide for the purpose of receiving the newsletter will be stored by us until you unsubscribe from the newsletter or until the purpose no longer applies. After unsubscribing from the newsletter or when the purpose ceases, the data will be deleted from the newsletter distribution list. We reserve the right to delete or block email addresses from our newsletter distribution list at our discretion, in line with our legitimate interests under Art. 6 para. 1 lit. f GDPR.

Data stored with us for other purposes remains unaffected. After you unsubscribe from the newsletter distribution list, your email address may be stored on a blacklist by us or the newsletter service provider if this is necessary to prevent future mailings. The data on the blacklist will only be used for this purpose and will not be merged with other data. This serves both your interest and our interest in complying with legal requirements for sending newsletters, according to legitimate interests under Art. 6 para. 1 lit. a GDPR. The storage on the blacklist is not time limited. You may object to the storage if your interests outweigh our legitimate interests.

19 Data security

Personal data is transferred to the website provider via internet by use of the "Secure Socket Layer (SSL)"- coding. The evodo webportal and the GfA website are protected against loss, destruction, access, changes to or distribution of personal data by unauthorized third parties through various technical and organizational means.

You can access and modify your user account on the evodo web portal only by entering your email address and personal password. You should always treat your login credentials, including passwords, as confidential and store them securely. After completing your session with the evodo web portal, you should log out and close your browser window.

20 Changes to these Data Privacy Regulations

We reserve the right to change these data privacy regulations at any time with effect for the future. An up-to-date version is available on the website. Please visit the website regularly and inform yourself about the applicable data protection regulations.