

**SCC EVENTS GmbH Data Protection Policy
for Participants in the Sports Event
GENERALI 5K as part of the BMW BERLIN-MARATHON**

The following English version is provided solely to aid in understanding. In the event of any conflicts arising about wording, the German original version shall be exclusively binding for all parties involved.

With this information, we, SCC EVENTS GmbH (hereinafter also referred to as "SCC EVENTS" or "we"), inform the participants about the processing of their personal data by SCC EVENTS GmbH and the rights to which they are entitled according to the data protection regulations in connection with the registration and participation in our GENERALI 5K event as part of the BMW BERLIN-MARATHON.

This document only describes the aforementioned data processing procedures.

In connection with the use of the online booking portal, additional personal data is processed for the corresponding purpose. The processing activities related to the online booking portal are described in the privacy statement for the user account available at: <https://www.scc-events.com/informationspflicht>.

Photos and videos are regularly taken during visits to or participation in our events. Processing activities related to the creation and publication of photo and video recordings during and after the sporting event are described in the 'Photo and Video' Privacy Policy, available at: <https://www.scc-events.com/informationspflicht>.

1. Responsible for data processing and data protection officer

SCC EVENTS GmbH
Olympiapark Berlin, Hanns-Braun-Straße / Adlerplatz, 14053 Berlin
Managing directors: Christian Jost, Jürgen Lock
E-Mail: informationspflicht@scc-events.com
Telephone: 030 / 30 12 88 – 10
Fax: 030 / 30 12 88 - 40

The data protection officer can be contacted by post at the above address with the addition of "data protection" or by email: datenschutz@scc-events.com.

2. Purpose and legal basis of data processing

We process the personal data of participants for the purposes of the organisation of the registration and the realisation of our sports events. The processing takes place in the context of the registration and participation in our sports event, in particular for the organisation, implementation and handling of all related processes.

The prerequisite to register for our sports event is the existence of an active user account in our online booking portal <https://login.scc-events.com/s/> in accordance with the General Terms and Conditions (GTC) <https://login.scc-events.com/s/terms-conditions>.

Additionally, all participants are subject to our Conditions of Participation for the Sports Event, available at <https://www.scc-events.com/teilnahmebedingungen>.

We process your personal data in compliance with the applicable data protection regulations of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

The processing of personal data is based on the following legal bases:

- A. Article 6 (1) lit. b GDPR for the fulfilment of pre-contractual measures and/or contractual obligations based on the conditions of participation: The processing is carried out in order to initiate and/or conclude a

contract for participation in the sports event. This includes all data required to process the individual order, the pre-order and the organisation of participation in the sports event.

The scope of the data is supplemented by the mandatory information that is processed when using the online booking portal available at <https://www.scc-events.com/informationspflicht>.

Information on photo and video recordings processed as part of participation in the sports event can be found at <https://www.scc-events.com/informationspflicht>.

During the course of the sports event, we collect and process further data of the participants on the basis of the aforementioned legal basis. This includes, in particular, competition data such as start numbers, timing data and results data and, where applicable, data to document rule violations, bans and medical care.

- B. Article 6 (1) lit. f GDPR: On the basis of a legitimate interest assessment, personal data is processed to assert legal claims, defend against legal disputes, and ensure IT and telecommunications security. In addition, SCC EVENTS processes the personal data of participants on this legal basis for the following purposes: for the personalised dispatch of (electronic and analogue) mail, for the purpose of self-promotion of its own services (direct advertising and event reminders), for the generation of statistical reports including the anonymisation of personal data in evaluation reports and, if necessary, the transfer of statistics to sponsors and business partners.

During and after the event, we collect and process additional data from participants on the above legal basis: e.g. for the provision and publication of results lists based on the competition data (the specific data types are described in Chapter 4 of this document), for press and media coverage, for documentation of advertising measures for sponsors and business partners, for competition documentation and record recognition, and for event documentation (e.g. creation of photo and video recordings).

Information about photos and videos processed in the course of your participation in the sports event can be found at <https://www.scc-events.com/informationspflicht>.

In addition, SCC EVENTS processes the registration and booking data of participants, in whole or in part, for the provision of access-protected log-in areas for these offers associated with the event: Photo & Video Retrieval. The log-in areas will be set up regardless of whether the services are used by the participants. The comparison of the login data from the offers with the information stored in the systems of SCC EVENTS is necessary to enable and technically implement the access protection.

- C. Article 6 (1) lit. c GDPR: Personal data is also processed to fulfil legal obligations. These include, for example, obligations to preserve records under commercial and tax law, corporate, contractual, data protection, and civil law requirements, as well as regulatory and governmental directives, including the fulfilment of documentation and accountability obligations, all in compliance with legal provisions.
- D. Article 6 (1) lit. a GDPR: Processing takes place in some cases based on consent for the explicitly specified purpose and with the voluntary provision of information in the collection form, for example, for the collection of emergency contact details; when specifying a club affiliation; to subscribe the email address stored in the booking portal to the newsletter; to receive survey mailings; or for other purposes explicitly described in the respective declaration of consent.
- E. Article 9 (2) lit. a GDPR: In some cases, special categories of personal data are processed based on consent for the explicitly stated purpose and when the voluntary provision of information in the collection form is given, for example when performing the PAPS test on our website www.paps-test.de and storing the PAPS key in the user account of the booking portal.

Insofar as consent (including implied consent) has been granted for the processing of personal data for specific, previously stated purposes, this processing is lawful on the basis of that consent. Consent can be revoked at any time, but the revocation does not affect the lawfulness of data processed prior to the revocation.

3. Recipients or categories of recipients of personal data

Within SCC EVENTS, only those employees/departments who require access to personal data in order to fulfil the respective objectives are granted access to such data for the purpose of organising and conducting sports events. In order to fulfil our contractual services and legal obligations, personal data may be processed in part by external service providers or, where necessary, by government authorities, to the extent that this is necessary and legally permitted for the fulfilment of the above purposes. In doing so, we always follow the provisions of data protection law, in particular any processing carried out by service providers engaged by us only takes place after the conclusion of contracts with a corresponding confidentiality clause.

| Recipient | Purpose of disclosure |
|--|---|
| Postal and courier service providers | Transport of mail, packages and letters |
| IT and telecommunications service providers | Maintenance, care and upkeep of the IT and telecommunications systems (hardware and software) |
| Telecommunications providers | Transport and storage of communication data |
| Website hosts | Hosting and providing public websites to publish contact and registration forms, information and images |
| Email providers | Transport of emails and attachments, sending of newsletters |
| salesforce.com Germany GmbH | Hosting and provision of the online booking portal with user account, mailing service |
| Print Shop | Production and dispatch of printed materials |
| Public authorities, e.g. tax office, regulatory authorities | Fulfilment of statutory duties to provide information and notification |
| Law firms and courts | Enforcement of claims, defence in legal disputes, legal advice |
| Sport-Club Charlottenburg e.V. | Organisation of the sports event |
| Data destruction service provider | Disposal of files and data media |
| Medical Institute | Medical care before and during the event, reporting and evaluation of medical incidents |
| SCC-EVENTS Photo Service Provider / Photo Box | Production of photo and video recordings |
| Sportograf Digital Solutions GmbH (exclusive photo and video service provider for selected events) | Creation, editing and storage of professional competition and event images (photo and video), allocation of the images created, processing of (pre-) orders and sales |
| mika:timing GmbH | Timing, timekeeping, results service, hosting and supply of results lists and certificates |
| Europ Assistance SA | Offer and handling of insurance issues regarding the cancellation option |
| Press (national and international) | Coverage, interviews, photo and video recordings |
| Business partners of SCC EVENTS, e.g. sponsors, advertising partners, service providers | Documentation and reporting, partly in connection with the documentation of advertising measures, for the provision of statistics, for the provision of booked |

| | |
|---|---|
| | services, for the publication of event information, photo galleries and video recordings on websites |
| Sports associations | Recognition and listing of records, monitoring and control of the implementation of rules for sports events |
| Public website(s) and magazines of SCC EVENTS | Publication of event information, results lists, photo and video recordings |
| Data Protection Officer | Fulfilment of the audit and control mandate, assistance with data protection matters |

It is possible that personal data may be transferred to countries outside the European Economic Area (EEA) (so-called third countries). Further information on the transfer of data to third countries is described in section 6.) of this document.

Our sports event is organised under the supervision of the following associations:

- 1 Deutscher Leichtathletik-Verband (DLV), Alsfelder Straße 27, 64289 Darmstadt
- 2 Berliner Leichtathletik-Verband (BLV), Hanns-Braun-Straße / Turnhaus, 14053 Berlin
- 3 Deutscher Rollsport und Inline-Verband e.V. (DRIV e.V.), Otto-Fleck-Schneise 10a, 60528 Frankfurt

Personal data (in particular results lists) will be processed by these associations for the purpose of recognising and listing records, in accordance with the applicable rules of the association. Further information can be found in the respective association rules. These can be found at: <https://www.scc-events.com/agb/verbandsregeln>.

4. Duration of data storage

We process the data of registered persons for the purpose of registration and subsequent participation in the sports event for the duration of the contract and the resulting storage obligations.

Stored Paps keys will be deleted one year after their creation.

Data and information on bans and rule violations will be deleted as soon as the ban is lifted or the rule violation is no longer subject to sanctions.

Emergency contact information will be deleted 4 weeks after the end of the event.

Competition data that is part of the reporting and documentation of the public, international competition will not be deleted. This concerns:

- a) the recognition and listing of records
- b) media coverage
- c) the final certificates with information from the results list
- d) the final result lists with the following data of the competitors Surname, first name, bib number, nationality, placings (by category), club if applicable, gender, age group and finishing times (if applicable also differentiated by intermediate, net and gross times, clock times, km/h data).

The right to object to the publication of this data remains unaffected.

Photographs and video recordings made during and after the event, which may be published, will not be deleted. The right of withdrawal and the right of objection remain unaffected. For further information on the retention period of image data, please refer to the 'Photo and Video' Privacy Policy available at <https://www.scc-events.com/informationspflicht>.

We store data processed on the basis of consent until it is revoked or until the respective purpose is fulfilled. Corresponding details can be found in the respective declaration of consent. The revocation of consent does not affect the lawfulness of the data processed until revocation. Data processing will also cease immediately in the event of a (legitimate) objection by the data subject.

Data necessary for the security of the processing and the prevention of security incidents (log data of the IT and telecommunications systems) will be completely deleted after 3 months. For further information, please refer to the privacy policy of the relevant website.

The storage of personal data for the establishment, exercise or defence of legal claims is possible and may extend the storage period.

Data protection requests: Requests for information, rectification, erasure or restriction of processing that we respond to, as well as other requests from data subjects or supervisory authorities on data protection issues, are archived for accountability purposes for a period of 3 years from the end of the action.

5. Data subjects' rights

All data subjects have the right to access the personal data referred to in Art. 15 GDPR, the right to obtain rectification of their inaccurately stored data according to Art. 16 GDPR, the right to obtain the erasure of personal data according to Art. 17 GDPR, the right to obtain the restriction of the processing of their data according to Art. 18 GDPR and the right to receive their personal data according to Art. 20 GDPR. Given consent can be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of the processing performed until the withdrawal.

Right to object:

Pursuant to Art. 21 GDPR, data subjects also have the right to object at any time to the processing of personal data concerning them. This applies in particular to the following cases:

A) Individual right to object (Article 21 (1) GDPR)

Data subjects have the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)(f) GDPR (data processing based on a balancing of interests). If the data subject objects, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or the processing serves the establishment, exercise or defence of legal claims.

B) Right to object to the processing of data for the purposes of direct marketing (Art. 21 (2) GDPR)

In individual cases, we process the personal data of our participants for the purpose of direct marketing (by post and email). The right to object may be exercised by the data subject at any time. If data subjects object to processing for direct marketing purposes, we will no longer process their personal data for these purposes.

Distinction: Communications carried out electronically or by mail for the fulfilment of business transactions (e.g., bookings or inquiries) are not affected by an objection to direct marketing.

Data subjects may send their requests to exercise their data protection rights informally by post or e-mail, stating their full name, to: SCC EVENTS GmbH, Olympiapark Berlin, Hanns-Braun-Straße / Adlerplatz, 14053 Berlin or datenschutz@scc-events.com.

Note on photo and video recordings at events organised by SCC EVENTS GmbH:

All information in connection with the production and publication of photo and video recordings during and after the respective event is described in the "Photo and Video" data protection information available at: <https://www.scc-events.com/informationspflicht>.

Right of appeal:

If data subjects suspect that their data is being processed unlawfully by SCC EVENTS, they may, of course, at any time seek judicial clarification of the matter. Data subjects also have every other legal option available to them. Notwithstanding the foregoing, data subjects have the right to lodge a complaint with a supervisory authority pursuant to Art. 77 para. 1 GDPR. The right to lodge a complaint pursuant to Art. 77 GDPR is available to data subjects in the EU Member State of their place of residence, their place of work and/or the place of the alleged infringement, i.e. they can choose the supervisory authority to which they turn from the above-mentioned places. The supervisory authority to which the complaint has been submitted will then inform them of the status and outcome of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

The data protection authority responsible for SCC EVENTS is:

Berlin Commissioner for Data Protection and Freedom of Information, Website: <https://www.datenschutz-berlin.de/>

Telephone: +49 (0)30 13889-0; Fax: +49 (0)30 2155050; Email: mailbox@datenschutz-berlin.de

Note on the publication of results lists:

The results lists are the final competition data of the participants in our sports events who have crossed the finish line and are used both for the personalised printing of certificates and for determining the rankings or new records and for compiling the list of the best in the respective public competition. In view of the public interest not only in our sports events but also in the individual participants, the results lists form part of the reporting and documentation of the public competition and are therefore regularly published on the Internet. We would like to point out that SCC EVENTS GmbH is only partially responsible for the data in the results lists and the media coverage. In particular, printed products such as daily newspapers or live broadcasts on radio and television are subject to reporting in the public interest due to the competitive nature of our sports events. Coverage may also be provided by private individuals, associations, sponsors and many other institutions. Whether and to what extent SCC EVENTS is (co-)responsible for the respective data processing in terms of data protection law will be examined on a case-by-case basis at the request of the persons concerned.

Once personal data has been published on the Internet, it can be accessed worldwide. Further dissemination or indexing by search engines or copying by third parties is therefore possible. Deletion of such data cannot be fully guaranteed.

In principle, when personal data is published on the Internet (regardless of the platform chosen), it cannot be ruled out that it may also be accessed from countries that do not have an adequate level of data protection. The authorised publication of personal data on the Internet does not constitute a transfer of personal data to a third country in this sense.

In the context of archiving for journalistic or statistical purposes, result lists or records may be stored worldwide beyond the periods specified here (Art. 85 and Art. 89 GDPR).

Data subjects may therefore contact us directly if they have any questions or requests regarding the published competition data concerning them.

6. Transfer of data to a third country or international organisation

As part of the organisation and execution of the Event, we may transfer personal data of Participants to third countries or international organisations. A list of these services and service providers that may be used is described in this section.

Third countries are countries outside the EEA to which the GDPR does not directly apply. The level of data protection there is not comparable to that in the EU. In order to compensate for the existing data protection deficit in the absence of an adequacy decision, we have agreed with the relevant service providers in the third country or international

organisation, in addition to the standard data protection clauses, further appropriate safeguards for the processing of personal data, so that the data protection standards for these data transfers are compatible with the legal data protection provisions of the EU and an adequate level of protection is ensured for the processing of personal data.

| Company name and address | Role of the company, activities/purpose of the transfer | Legal basis for the data transfer |
|--|--|---|
| Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland / Headquarters: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA | Processors, IT infrastructure, servers for the transmission, storage and archiving of transactions, documents and emails | International organisation, standard data protection clauses EU Controller to Processor: https://cloud.google.com/terms/sccs/eu-c2p |
| Salesforce.com Germany GmbH, Erika-Mann-Str. 31, 80636 München / Headquarters: Salesforce.com, inc., Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA | Processor, online booking portal with user account management, participant database | International organisation, DPA: https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf (Based on the certification of Salesforce.com, inc. in the DataPrivacyFramework) |

7. Voluntary nature and obligation to provide personal data

Registration and participation in the sports event are generally voluntary. In the event of participation, the data required for the organisation and execution of the sports event in accordance with the conditions of participation and contractually prescribed must be provided. Failure to provide the data will result in the inability to participate in the sports event. The conditions of participation for our sports event are available at:
<https://www.scc-events.com/teilnahmebedingungen>.

Registration for our sports event requires the existence of an active user account on our online booking portal <https://login.scc-events.com/s/> in accordance with the General Terms and Conditions (GTC) <https://login.scc-events.com/s/terms-conditions>.

Where it is possible to provide information on a voluntary basis, we have indicated this in the relevant data collection form. Consent may be withdrawn by the data subject at any time with effect for the future.

8. Automated decision-making, performance of profiling

We do not exclusively use automated decision-making within the meaning of Article 22 GDPR for the organisation and execution of our event.

"Profiling" is a form of automated processing of personal data evaluating personal aspects relating to a natural person, in particular for the purpose of analysing or forecasting the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or change of location, where this produces legal effects concerning the data subject or similarly significantly affects him or her. SCC EVENTS GmbH will not process the data of participants for the purpose of profiling.