



## Data Protection Policy (As of April 2024)

### § 1 General Information

XAL places high priority on handling personal data responsibly. We want you to be aware of the data that we collect from you, when we collect it and how we use it. We have undertaken the necessary technical and organisational steps to ensure that data protection regulations are observed both by us and by our external service providers.

### § 2 Responsible Entity

The operator of this website is XAL GmbH, Auer-Welsbach-Gasse 36, 8055 Graz. The entity responsible within the meaning of the Personal Data Protection Act ("PDPA") is XAL Singapore Pte Ltd., 4 Battery Road, #25-01, Bank of China Building, Singapore (049908). If you have any questions regarding data protection or the processing of your personal data, please contact us at:

XAL GmbH  
Auer-Welsbach-Gasse 36  
8055 Graz, AUSTRIA  
T: +43 316 3170 0  
office@xal.com

You can reach our data protection officer at:

T: +65 84270641  
dataprotection@xal.com  
4 BATTERY ROAD  
#25-01  
BANK OF CHINA BUILDING  
SINGAPORE (049908)

### § 3 Data Processed

We process various categories of your personal data, which are dependent on whether you visit our website, whether you subscribe to our newsletter, whether you agree to the use of cookies and which you allow, or if you enter into a business relationship with us. Please note that the PDPA and the content of this Data Protection Policy do not apply to business contact information. Business contact information refers to "an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his or her personal purposes".

#### 3.1 Data processed when you visit our website

You can visit our website without providing any information about yourself, we only save the initial access data in a log file. We understand initial access data to mean the date and time of access, the IP address in anonymous form (the last three digits are not displayed), the session ID, the pages accessed on our website and for how long it was accessed, the name of the website from which our website was accessed and information about the browser used. We evaluate this data exclusively to improve our website and no conclusions are drawn about your person. You can also disable the storage of this anonymized data via opt-out.

#### 3.2 Processed data with consent to cookies

If you agree to the use of cookies, each cookie processes different data about you (e.g. IP address, location, browser language, user behaviour, etc.). You can find more detailed information about the cookies we use under Section 9 of this Data Protection Policy and in our [Cookie Policy](#).

#### 3.3 Data processed when you subscribe to our newsletter

If you subscribe to our newsletter, we will process specifically your name and e-mail address for registration. In order to provide you with targeted information, we also collect and process the industry sector in which you work and the country in which you are based, if you provide this data voluntarily. This data is stored for the duration of subscription to the newsletter. If you have subscribed to our newsletter, we also keep a record of the newsletter articles you have viewed. You can revoke your newsletter subscription and the consent you have given to processing of your personal data, at any time, in writing. You can revoke your consent at any time by clicking on the link in the newsletter, in writing, by sending an email to newsletter@xal.com, or by adjusting your preferences on our website. We will then immediately delete all of your personal data related to delivery of the newsletter.

#### 3.4 Data processed when registering for and participating in events (online or in person)

In the context of organizing and hosting events (e.g. training courses, seminars, get-togethers, webinars, presentations), we process in particular your contact data such as your name and e-mail address for the registration for an event. For the coordination of the event and the transmission of information in connection with this event (e.g. the sending of training materials after a webinar) and answering queries, we store and process your data. We then immediately delete all of your disclosed personal data, unless you have consented to further processing.

In the course of the event, we reserve the right to make visual and sound recordings for marketing purposes. You agree to the use those recordings with your participation. However, you can object to the recordings directly at the event.

#### 3.5 Data processed when contacting us

If you contact us e.g., by e-mail or a contact form (existing or yet to be implemented), we process your personal data such as your name, form of address, telephone and fax number, e-mail address and the language of correspondence. This data is stored by us to process the request and in the event of follow-up questions. The same applies if you provide us with your personal data for the purpose of being contacted by us (e.g., by telephone or by handing over a business card).

#### 3.6 Data processed when contacting us

In the event that you enter into a business relationship with us, we collect the following (personal) data:

- Name
- Title
- Business address and other addresses
- Telephone number
- E-mail address
- Profession/Professional title/Job title
- Date of birth
- Registered business number
- Contact persons
- Sector
- Employer
- Order data
- Product preferences
- Internal customer ID
- Language
- Gender
- VAT identification number

In addition, we will assign you an internal customer or supplier number.

Your data will be stored as long as it is necessary for the fulfillment of the contract or the performance of pre-contractual measures.

### 3.7 Data processed when using the myXAL / UNICO configurator

When you register a myXAL account, we store your contact details. The details are your first and last name, your e-mail address and the country in which you live. Further data such as your address, telephone number, company and job title are only mandatory for the use of certain functions; you will be informed of this separately when using them. In addition, within the context of cookies, we process the IP data of the subscriber and the content of your product and project list. We process this data in order that you are able to create product lists and use the service functions of the account. When you delete your account, your data will also be deleted. If, on the other hand, you only want to use the UNICO configurator, we will only process your e-mail address for this purpose.

### 3.8 Data processed when using our live chat

When using our live chat to contact us, you chat with a member of our customer support team. In particular, we process your e-mail address and name. Please note that the live chat is only available when accepting all cookies.

### 3.9 Data processed when applying for a job

If you submit your application to us, you agree that the data determined during the application and the data contained in the documents sent along with the application as well as the data determined in the course of any interview (hereinafter collectively referred to as „data“) may be stored by XAL in an applicant database for the purpose of coordinating and processing the application.

In the case of an application, we collect in particular, but not exclusively, the following (personal) data:

- Name
- Address
- Date of birth
- Place of birth
- Title
- Telephone number
- E-mail address
- Picture
- Marital status
- Criminal record
- Social security number
- Periods of previous service including employer
- Training certificates

You can revoke your consent to data processing at any time in writing by mail to the person responsible or by e-mail to hrm@xal.com. We reserve the right to delete your data at any time even without consent.

### § 4 Period of Storage

In principle, we only store your data for as long as it is needed. By default, your data is stored as long as necessary to fulfill the purposes for which it was collected according to Sec. 25 PDPA.

### § 5 Purposes of Processing

We process the data collected from you primarily for the purpose of fulfilling the contract or to carry out pre-contractual procedures. Furthermore, we are subject to statutory obligations to process data, e.g., for reasons of applicable tax and commercial law provisions, as well as anti-corruption and anti-money laundering regulations. We process data, such as your name and e-mail address, that you have voluntarily made available to us, on the basis of your consent or based on our legitimate interest for the purpose of customer service, for our own advertising purposes, such as sending out promotional offers, advertising brochures and newsletters (in paper and electronic form), as well as for the purpose of indicating the existing or previous business relationship with the customer (reference notice). The data processing takes place on the basis of the applicable statutory provisions as well as on the basis of your consent and for the purpose of fulfilling the contract. Should we plan to use personal data for a different purpose than listed in 3.1-3.9 and 5, we will obtain your consent prior to collecting, using or disclosing the personal data or notify you about the deviating purpose, provided that no exemption to the consent or notification obligation applies according to the PDPA.

In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for our legitimate interests, if our assessment determines, that our legitimate interests outweigh any adverse effects on you.

### § 6 Our Principles in connection with the processing of your personal data

It is important to us that we comply fully with all statutory data protection regulations. Your personal data is processed on the basis of the Personal Data Protection Act (PDPA). Your personal data is secure with us. Your data will not be sold, loaned or rented by us or passed on to third parties in any manner or form, without your express consent. In certain cases, however, your personal data will be transferred to contract data processors, if they provide sufficient guarantee of lawful and secure use of data and if they are contractually obligated to comply with the principles described in this Data Protection Policy and the statutory regulations. However, we reserve the right to transfer your personal data to another company, as part of business restructuring or company mergers, provided that this company undertakes to comply with our principles in connection with the processing of personal data and has its registered office either within Singapore or in a third country with appropriate data protection. We also reserve the right to pass on your personal data to third parties if we are required to do so by law, a final judgement of the relevant court or an order of the relevant authority. We also reserve the right to pass on your personal data if, as a result of acts or omissions on your part, we are forced to protect or have our rights, property or assets protected by the relevant authorities. We limit our data processing to a necessary and sensible extent. We also explain to you for what purpose we collect and process your data. If your personal data is no longer required for use, it will be deleted.

In the unlikely event of an incident, where information is stolen or taken from our system without our knowledge or authorization (Data Breach), we will notify the Singapore Personal Data Protection Commission as well as the affected individuals in accordance with the provisions of the PDPA.

All employees from XAL are made aware of the importance of maintaining confidentiality of the personal data collected from our business partners or staff. Our employees' access to personal data is on a need to know basis only.

### § 7 Data Transfer and Order Data Processing

As part of a global group, the branches of our subsidiary companies and our extended group of companies, as well as external service providers, are located both inside and outside of Singapore. We may also use a contract data processor for processing your data. We pass on your data to the following recipients or recipient categories, e.g.: tax consultants, legal representatives, banks, subcontractors, suppliers, group companies. Some of your data will also be forwarded to countries outside of Singapore and processed there. This primarily affects the European Union, the EEA, the United States of America, India, the People's Republic of China, the United Arab Emirates and the United Kingdom. The data transfer is based on the order data processing contracts that we have concluded with the corresponding order data processors and will only be conducted in accordance with the requirements of the PDPA. If you actively decide to use the social network functions that are offered through our online



presence, your personal data will be forwarded to the respective external providers of these social networks.

#### **§ 8 Automated Decision-Making and Profiling**

We only use partially automated procedures for data processing if you have given us your consent. This allows us to analyze your interactions with us and other companies in the XAL Group in order to provide you with the most relevant information possible. You can find out which companies belong to the XAL Group here. For example, we analyze which events you have attended and which articles you have viewed in our newsletter (if you are subscribed to the newsletter). This allows us to present you with content that is of particular interest to you. This is called profiling - because the data we combine in this way results in a user profile. You have the option to revoke your consent to profiling for marketing purposes at any time. This can be done by mail, by email or directly on our website.

#### **§ 9 Cookies**

Our website uses cookies to collect personal data as well as standard internet log data and information on the behavioural patterns of end users when visiting our website. When visiting our website, first of all, you can determine your cookie settings. You can decide which categories of cookies you allow. We collect different data from you, depending on which cookies you allow. This is performed in order to offer you a better user experience, to recognise preferences, to diagnose technical problems and to analyse trends as well as to make product recommendations matched to your interests. In addition, most browsers allow you to select whether you wish to allow cookies or not. If you do not want cookies to be stored on your computer, please set your browser preferences before accessing our website so that all cookies are rejected. Please note that this may mean that some functions of our website are not available. Further information on how to check which cookies have been stored and how to manage and delete them, can be found under [www.allaboutcookies.org](http://www.allaboutcookies.org). Cookies are text files that websites store on your computer, or other terminal, for the purpose of logging and improving functionality. Most cookies are known as session cookies and are deleted from your device after the browser session has ended. Other cookies remain stored on your device and enable us to recognise your device on your next visit (referred to as long-term cookies). We also use third-party cookies on our website. You can read more information about which cookies we use and which data they store in our [Cookie Policy](#).

#### **§ 10 Your Rights**

You have the following rights in connection with the use of your personal data:

**Right of access by the data subject (Sec. 21 PDPA):** You can request information at any time as to whether and which personal data we are using. You also have the right to know what purposes the processing serves, from where the data originates, to which recipients we transmit the data and how long we store this data.

**Right to correction (Sec. 22 PDPA):** If you find that the personal data that we are processing is incorrect, you are entitled to request that this data be corrected at any time. If, in your opinion, data is incomplete, you are entitled to request that this data be corrected.

**Right to withdrawal of consent (Sec. 16 PDPA):** You can at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by us. Upon your Withdrawal we will inform you of the likely consequences and will cease to collect, use or disclose your personal data.

**Right to data portability (Sec. 26H PDPA):** The right to data portability ensures that the personal data we process, on the basis of a contract or consent, is made available to you in a structured, commonly used and machine-readable format. You can also request that we transmit this data directly to a controller.

**Right to lodge a complaint with a supervisory authority (Sec. 48H PDPA):** If you believe that your rights in respect of your personal data have been infringed, you have the right to lodge a complaint with the supervisory authority Personal Data Protection Commission (PDPC).

If you have any questions or points of clarification about your rights, please do not hesitate to contact our data protection officer at the following e-mail address: [dataprotection@xal.com](mailto:dataprotection@xal.com)

#### **§ 11 Protection of Your Data**

We take technical and organisational steps to protect your data, in the best possible manner, against loss, destruction, access or modification, as well as distribution, by unauthorised persons. We regularly evaluate these measures and adapt them to progress in technology. It is important for us to emphasise to you that, despite extensive measures, it is not possible for us to guarantee absolute protection of your data.

#### **§ 12 Changes to the Data Protection Regulations**

Statutory changes or changes to internal company processes may make it necessary to adapt these data protection provisions, and we accordingly reserve the right to do so. We ask you to read this data protection declaration on a regular basis.