Light is OSRAM

OSRAM

Privacy Policy for HubSense Commissioning Tool

Our business is based on trust. Osram companies around the globe are committed to protecting personal data and therefore we undertake to comply with the EU General Data Protection Regulation ("**GDPR**") and other applicable data protection laws and strive to constantly improve our internal data protection processes.

THIS PRIVACY POLICY IS DESIGNED SPECIFICALLY FOR INFORMATION OF USERS OF THE HUBSENSE COMMISSIONING TOOL (ALSO THE "**TOOL**") AND PROVIDES YOU WITH A DETAILED OVERVIEW OF PERSONAL DATA THAT IS COLLECTED AND PROCESSED BY OSRAM IN THE HUBSENSE COMMISSIONING TOOL, PURPOSES OF RESPECTIVE PROCESSING ACTIVITIES AND OUR PRIVACY PRACTICES.

PLEASE, READ THIS PRIVACY POLICY BEFORE USING THE HUBSENSE COMMISSIONING TOOL, INCLUDING ITS WEB-BASED VERSION AND MOBILE APPLICATION AS WELL AS OTHER ASSOCIATED SOFTWARE. YOU CAN ONLY ACCESS AND USE THE TOOL, IF YOU AGREE TO AND ACCEPT THE PROVISIONS OF THIS PRIVACY POLICY AND PROVIDE YOUR CONSENT TO DATA PROCESSING ACTIVITIES, AS SET OUT BELOW.

1. **Name and contact details of the Controllers:**

Data Controller responsible for data processing in the HubSense Commissioning Tool within the meaning of the EU General Data Protection Regulation is:

Osram GmbH ("**OSRAM**")
Marcel-Breuer-Straße 6
80807 Munich
Germany
Tel.: +49 89 6213-0
Fax: +49 89 6213-2020
E-mail: contact@osram.com
Web: www.osram.com

Our business partner **Silvair sp. z o.o. ("Silvair")**, which is a limited liability company incorporated under the laws of Poland, with its registered office in Kraków at ul. Jasnogórska 44, 31-358 Kraków, Poland, manages the HubSense Commissioning Tool and therefore is an independent Data Controller responsible for the processing activities necessary to supply, operate and maintain, enhance and improve the Tool, to assess and improve their business, and to carry out anonymization of the collected data.

PLEASE READ ABOUT PERSONAL AND OTHER DATA PROCESSED BY SILVAIR AND ITS USE AS WELL EMPLOYED PRIVACY SAFEGUARDS IN **SILVAIR COMMISSIONING PRIVACY NOTICE** BEFORE USING THE HUBSENSE COMMISSIONING TOOL.

2. Scope of data collection

The following data is collected by Osram in the context of the HubSense Commissioning Tool:

- name, email address, phone number and other personal data provided to Osram by a user of the Tool necessary for the provision of the technical support;
- names, contact details and other personal data collected by Osram within the framework of additional services, offered to users directly in lighting projects in the Tool (e.g., the pre-commissioning service);
- other personal data necessary for operation, maintenance and improvement of the HubSense Commissioning Tool.

3. Legal basis for data processing

The legal basis for the processing of personal data in the context of the HubSense Commissioning Tool is a consent of users to the processing of their personal data (Art. 6 para. 1 point (a) GDPR).

4. Purposes of data processing

The data collected by Osram in the context of the HubSense Commissioning Tool is used for the following purposes:

- provide users of the Tool with technical support;
- provide additional services to users directly in lighting projects;
- perform anonymization of the personal data collected and stored;
- to protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- to comply with applicable legal requirements applicable to the Osram and its internal policies;
- analyze, enhance and improve the Tool (including developing new features and services).

5. Disclosure and transfer of personal data

Osram may share your personal data with:

- other Osram group companies;
- in case of involvement of required service providers to any such service provider (including IT-providers).

If external recipients of the data are located within a Member State of the European Union ("EU") or within a Member State of the European Economic Area ("EEA"), Osram concludes order processing agreements with them according to Art. 28 GDPR.

In case if recipients are in countries without adequate level of data protection, OSRAM has taken measures to ensure appropriate and adequate guarantees for the protection of personal data. If the data is transferred:

- to group companies in such countries, it will be ensured that these companies have signed and adhere to the binding company policy for the safety of the personal data (Binding Corporate Rules "BCR"). More information regarding the OSRAM BCR can be found here.
- to external recipients in such countries, the data will only be transferred (i) if they have signed the EU standard contractual clauses with OSRAM or (ii) - for recipients in the USA - if they are certified under the EU/US Privacy Shield.

6. Retention periods

Personal data collected by Osram in the context of the HubSense Commissioning Tool will be deleted, (i) if it is no longer necessary for the purposes of data processing indicated above and (ii) there are no legal obligations to keep the data (e.g. trading, tax or pension retention obligation).

7. Withdrawal of consent

You have the right to withdraw consent to the data processing by Osram in the context of the HubSense Commissioning Tool at any time with effect for the future. This means that any processing based on your consent prior to the withdrawal will remain valid. In this case, we may still be authorised to process your personal data after withdrawal your consent, if we have the legal basis for such processing, for the purposes determined by that legal basis.

Please, note that if you withdraw your consent for one of the purposes indicated above, then, in some situations the functionalities of the HubSense Commissioning Tool may not be available for you.

8. Your other rights

If your personal data is processed in the HubSense Commissioning Tool, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis Osram:

- to access to your personal data by requesting sharing and/or sending a copy of all your personal data processed by us;
- to request rectification of inaccurate personal data by indicating the data requiring rectification;
- to request erasure of your personal data; we have the right to refuse to erase the personal data in specific circumstances provided by law;
- to request restriction of processing of your personal data by indicating the data which should be restricted;
- to object to processing your personal data conducted based on grounds relating to your particular situation.

Please contact Osram Data Privacy Office at privacy@osram.com, if you are willing to assume any of the above rights.

Please, note that Osram has no possibility to satisfy your legal rights regarding data processing in the context of the HubSense Commissioning Tool carried out by Silvair (see para. 1 above). In case you want to make use of any of your data subject rights in relation to the data processed by Silvair, please contact Silvair directly. You can find more information on how you can contact Silvair here.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority in the EU-Member State of your habitual residence, your place of work or place of the alleged infringement, if you believe that the processing of personal data relating to you infringes the GDPR.

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

9. Updates to this Privacy Policy

This Privacy Policy may be amended from time to time. You can find the date when it was last updated on the top of the given document.

10. Osram Data Privacy Office

The OSRAM Data Privacy Office is pleased to support you with all inquiries regarding data protection – just contact us at privacy@osram.com.

If you want to know more about our data privacy practices and commitments, please visit our Privacy Policy on Osram International homepage.