

SCC EVENTS GmbH Data Protection Policy Regarding Photo and Video Recordings at SCC Sports Events

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 notice, we are informing you about the processing of your personal data by SCC EVENTS GmbH (hereinafter also referred to as "SCC" or "we") and the rights to which you are entitled under the Data Protection Act in connection with your attendance or participation in an SCC sporting event.

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
Phone: 030 / 30 12 88 - 10
Fax: 030 / 30 12 88 - 20

The data protection officer can be contacted by post at the above address with the keywords "Data Privacy" or by e-mail: datenschutz@scc-events.com.

2. Purposes and legal basis of data processing

We process your personal data in accordance with the legal regulations of the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant legal regulations (e.g. Copyright Act, Art Copyright Act).

At our public sporting events, photos and videos are regularly produced by us and by exclusive service providers commissioned by us. Media coverage is also regularly provided by representatives of the press (radio, television and live broadcasts) or by sponsors, in accordance with the competitive character and the international public interest in the respective event. In the context of your visit or your participation on site at one of our sporting events, the image recordings (video and photo) make your personal data part of our processing activities.

The legal basis for the lawful processing of your personal data as a participant or visitor of the sports event is derived from:

- A. Article 6 (1) lit. b) GDPR: within the scope of your participation for the processing of contractual, offered or booked services in connection with the event (concerning participants of the sports event), e.g. for the creation, processing and storage of professional competition images by exclusive photo and video service providers for the fulfilment of pre-orders or purchase offers within the scope of the respective event, including the matching and allocation of the created images to individual participants and the creation of a protected log-in area for each participant on the websites of the exclusive photo and video service providers utilised (if part of the services offered for the respective event) for retrieval of the available individual images of the event by the respective participant. The data protection notices of the exclusive photo and video service providers are available at: <https://www.scc-events.com/en/privacy-information>
- B. Article 6 (1) lit. f) on the basis of balancing of interests (concerning visitors and participants of the event): for media coverage by us, the press or media, for documentation of the advertising measures for sponsors and

partners, for competition documentation, for the creation of professional competition images by exclusive photo and video service providers, for the purpose of direct advertising and for commercial publication on the Internet in compliance with national legislation (Art Copyright Act), for permanent storage and provision of the created image recordings by us and the exclusive photo and video service providers in compliance with copyright and usage rights to send reminders or information by e-mail, to assign created photo and video recordings of individual participants by us or the exclusive photo and video service providers by transmitting individual data from the participant registration and booking for the respective sporting event

- C. Article 6 (1) lit. c) GDPR for the fulfilment of legal obligations arising from legal regulations: e.g. obligations to provide evidence and accountability or retention obligations arising from obligations under company, data protection and civil law, taking into account and complying with legal provisions
- D. Article 6 (1) lit. a) GDPR with consent: for the use of photographs and video recordings which depict clearly identifiable persons and are to be used for the purpose of commercial publication in digital or printed media by SCC or with the consent of the parent or guardian in the case of recordings of minors that are intended to be published.

If we have been granted permission to process personal data for specific, previously mentioned purposes, the legality of this processing is based on the consent. Consent that has been granted can be revoked at any time. The revocation of consent does not affect the lawfulness of the data processed until revocation.

3. Recipients or categories of recipients of personal data

In order to fulfil our contractual services and legal obligations, your data is partly processed in part by external service providers and partners if this is necessary to fulfil the aforementioned purposes and is permitted by law. 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.

<u>Recipient</u>	<u>Purpose of Disclosure</u>
IT Service Provider	Servicing, maintenance and servicing of IT systems (hardware and software)
Website Hoster	Provision of published information and images (photos and videos)
Printer	Creation and dispatch of printed products
Law firms and courts	Enforcement of claims, defence in legal disputes
Sport Club Charlottenburg e.V.	Organisation of the sports events
Data destruction service provider	Disposal of files and data carriers
SCC Photographers	Creation of photo and video recording
Sportograf GmbH & Co. KG (exclusive photo and video service provider at certain SCC events)	Creation of photos, transmission of participants data (race number and date of birth) for individual allocation of the created competition photos to enable orders in the log-in area of the website
Marathon-Photos.com Ltd (exclusive video service provider at GENERALI BERLIN HALF MARATHON)	Creation of video recordings, transmission of data (race number, last name, first name, date of birth and times of results) for individual allocation of the created competition videos and completion information by e-mail to enable orders in the log-in area of the website
Press (national and international)	Reporting, live broadcast, interviews, photo and video recordings
Sponsors and advertising partners	Documentation and reporting, personalised vouchers

Public website(s) of SCC, of the sponsors, the partners, the service providers and the press	Publication of event information, photo and video recordings
Social media platforms (SCC profiles)	Publication of event information, photo and video recordings
Video platforms	Publication of video recordings and photo series

In the context of the publication of photo and video recordings on our Internet pages, on social media profiles and on video platforms, it cannot be excluded that personal data may be transferred to other countries outside the European Economic Area (EEA) (so-called third countries). Further information on the transfer of such data to third countries can be found in this document under point 6).

The operators of the social media platforms are jointly or separately responsible and are listed below:

- 1 Twitter: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland
- 2 Facebook: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- 3 Instagram: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

The operators of the video platforms are own responsible parties or order processors and are listed below:

- 1 Vimeo: Vimeo Inc., 555 West 18th Street, New York, 10011, USA
- 2 YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

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

4. Duration of data storage

Photographic and video recordings of public sporting events are generally archived by us for an unlimited period of time for the purpose of event documentation.

Photo and video recordings of the participants made by the exclusive photo and video service providers are stored for an unlimited period of time and are available to the participants individually for retrieval and purchase from the respective service provider. Corresponding information can be found in the respective data protection notices of the exclusive photo and video service providers, available at: <https://www.scc-events.com/en/privacy-information>

We store video and photo recordings that are processed on the basis of consent until revocation or until the respective purpose is fulfilled. Corresponding information can be found in the respective declaration of consent. The revocation of a consent does not affect the legality of the data processed until the revocation.

When publishing the photo and video recordings on our websites, social media and video platforms, the recordings selected for this purpose can also be accessed for an unlimited period of time. The right of objection and/or revocation remains unaffected.

After the publication of the photo and video recordings on our websites, the social media and video platforms, the data can be accessed worldwide on the Internet. Further distribution or indexing by search engines or copies by third parties are thereby possible. A deletion of this data cannot be ensured.

We store our responses to the data protection inquiries regarding information, correction, deletion or restriction of processing, as well as other inquiries from data subjects or supervisory authorities regarding data protection issues for the purpose of accountability for three years.

5. Rights of data subjects

All data subjects have the right of access in accordance with Art. 15 GDPR, the right to obtain rectification of their inaccurately stored data in accordance with Art. 16 GDPR, the right to obtain the erasure of personal data in accordance with Art. 17 GDPR, the right to obtain the restriction of processing of their data in accordance with Art. 18 GDPR and the right to receive their personal data in accordance with Art. 20 GDPR. Consent granted can be revoked at any time. The revocation of a consent does not affect the legality of the data processed until the revocation.

Right to object:

In accordance with Article 21 GDPR, data subjects also have the right to object at any time to the processing of personal data concerning them.

A) Right of objection in individual cases in accordance with Art. 21 (1) GDPR

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you, which is carried out on the basis of Art. 6 (1) lit. f) GDPR (data processing based on a weighing of interests). If you lodge an objection, we will no longer process your personal data, unless we can prove compelling reasons for processing worthy of protection that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

B) Right to object to the processing of data for the purposes of direct advertising in accordance with Art. 21 (2) GDPR

In individual cases, we or our exclusive photo and video service providers process your personal data for the purpose of direct advertising (by post and e-mail). You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising. If you object to the processing for direct marketing purposes, we will no longer process your personal data for these purposes.

Please send any requests to exercise your rights as a data subject, stating your full name, by mail or e-mail to our data protection officers: SCC EVENTS GmbH, Data Protection Officer, Olympiapark Berlin, Hanns-Braun-Strasse / Adlerplatz, 14053 Berlin or datenschutz@scc-events.com

Right of appeal:

If you suspect that we are processing your data unlawfully, you can of course obtain a legal clarification of the problem at any time. In addition, every other legal option is open to you. Irrespective of this, you have the option of contacting a supervisory authority in accordance with Art. 77(1) GDPR. The right of appeal pursuant to Art. 77 GDPR is available to you in the EU member state of your place of residence, your place of work and/or the place of the alleged infringement, i.e. you can choose the supervisory authority to appeal to from the above-mentioned places. The supervisory authority to which the complaint has been submitted will then inform you of the status and results of your submission, including the possibility of a judicial remedy in accordance with Art. 78 GDPR.

Note on publication:

We would like to point out that in particular the data of media reporting is only partially the responsibility of SCC EVENTS GmbH. In particular, printed products such as daily newspapers or live broadcasts via radio and television are subject to reporting in the public interest due to the competitive character of our sporting events, so that the rights of individual affected persons do not fundamentally prevail. Therefore, please contact us directly if you have any questions

or requests concerning these topics: Revocation of a consent or objection to data processing in the case of publication of names, pictures or film recordings on the websites and social media appearances of SCC, on video platforms, on websites and social media channels of other operators (sponsors, associations, photo and video service providers), in the press or in media reports.

Please note that in the context of archiving and reporting for journalistic purposes, photo and video recordings may be stored worldwide even beyond this period (Art. 85 and Art. 89 GDPR).

After the publication of personal data, the data can be accessed worldwide on the Internet. Further distribution or indexing by search engines or copies by third parties are thus possible. A deletion of these data cannot be guaranteed continuously.

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

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

We sometimes transfer personal data to third countries and to international organisations. A list of these services and service providers that may be used in the creation, storage and publication of photo and video recordings is provided in this document.

Third countries are those countries outside the EEA in which the GDPR is not directly applicable. The level of data protection is not comparable with 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 service providers concerned in the third country or with the international organisation on further suitable guarantees for the processing of personal data in addition to the standard data protection clauses, so that the data protection standards for these data transfers are compatible with the legal data protection provisions of the EU and adequate protection is ensured when processing personal data.

Name and address of the company	Data processor or joint controllership, activities/purpose of the transfer	Legal basis for the transfer of data to a third country or international organisation
Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland	Joint responsibility, operation of the social media platform Twitter	International organisation, standard data protection clauses EU Controller-to-Controller https://gdpr.twitter.com/en/controller-to-controller-transfers.html
Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland	Operation of the social media platforms Facebook and Instagram	International organisation, standard data protection clauses EU Controller-to-Controller https://www.facebook.com/legal/EU_data_transfer_addendum/update
Vimeo Inc., 555 West 18th Street, New York, 10011, USA	Own responsibility, operation of the Vimeo video platform	Headquarters in a third country, https://vimeo.com/privacy
Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland	Order processor, operation of the video platform YouTube	International organisation, standard data protection clauses EU Controller-to-Processor, https://www.youtube.com/t/terms_dataprocessing und

		https://business.safety.google/adsprocessor/terms/scs/eu-c2p/
Marathon-Photos.com Ltd., PO Box 60, 170 Collingwood Street, Hamilton 3240, New Zealand	Joint responsibility, exclusive video service provider	Headquarters in the third country, adequacy decision of the EU Commission, available at: https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32013D0065 and Art. 26 - Contract
Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland / Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA	Order processor, IT infrastructure, server for storing and archiving photo and video recordings	International organisation, standard data protection clauses EU Controller-to-Processor https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf

We would like to point out that especially the data of media and journalistic reporting are only partially subject to the responsibility of SCC EVENTS GmbH and are not named here in detail due to regularly changing press representatives.

7. Voluntary nature and obligation to provide personal data

Attendance and participation in an SCC sporting event is always voluntary and is not required by contract or law. Every visitor and participant is informed upon entering the event site that personal data may be collected in the form of photographs and video recordings.

You can revoke the processing of personal data based on consent at any time for the future. Furthermore, all visitors and participants have the right of objection.

8. Automated decision making, profiling

There is no automated decision-making within the intent of Article 22 GDPR.

"Profiling" is a form of automated processing of personal data using the assessment of personal aspects relating to a natural person, in particular for the purpose of analysing or predicting the performance of work, economic situation, health, personal preferences or interests, reliability or conduct, whereabouts or change of location of the data subject, where this produces legal effects concerning the data subject or significantly affects him/her in a similar way. Your data will not be processed by SCC EVENTS GmbH for the purpose of profiling.