Privacy Notice on the Grievance Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains

Dated: November 2024

In this Privacy Notice, we, Leica Camera AG (hereinafter also referred to as "we" or "us"), inform you how we process your personal data when we have acquired such data from you or a third party from a report made in conjunction with the Grievance Procedure pursuant to the German Act on Corporate Due Diligence Obligations in Supply Chains ("LkSG"), hereinafter referred to as the "Grievance Procedure".

Where our subsidiaries process data in connection with the Grievance Procedure, we also inform you in this Privacy Notice about how our subsidiaries process data.

1 Data Controller and contact

1.1 Data Controller

The controller for data processing is initially:

Leica Camera AG

Am Leitz-Park 5 D-35578 Wetzlar

In case of confidential enquiries, please contact:

Leica Camera AG

Private/confidential Compliance Officer Am Leitz-Park 5 D-35578 Wetzlar

Email address: compliance@leica-camera.com

The purpose of the Grievance Procedure is to enable Leica Camera AG to receive, assess and identify notifications and complaints (hereinafter referred to as "reports") that relate to human rights and environmental risks and/or such potential or actual breaches of duty that could have resulted from the business conducted by Leica Camera AG itself or through a direct or indirect supplier (hereinafter referred to as "suppliers").

In certain circumstances, we and our subsidiaries may process reports. This is especially the case if the report concerns a supplier of our subsidiary (hereinafter also referred to simply as the "affected subsidiary"). In such cases, we generally only forward anonymised data to our subsidiaries. However, if personal data is processed during the joint processing of reports, we are jointly responsible for the processing together with the subsidiaries involved in the processing in accordance with Art. 26(1) Sentence 1 of the General Data Protection Regulation ("GDPR"). These processing operations are covered both in this Privacy Notice and in the agreement on joint responsibility, relevant excerpts of which Leica Camera AG and its subsidiaries (hereinafter referred to as "Leica Camera Group") will be happy

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to provide on request. You can address your enquiry to the contacts named in <u>Section 1</u> herein or – if regarding a subsidiary of the Leica Camera Group – to the contacts named in **Annex 1**.

Leica Camera AG is responsible for fulfilment of the information obligations in accordance with Art. 13 and 14 of the GDPR.

1.2 Exercise of the rights of data subjects and queries

If you have any questions or suggestions regarding data protection, or wish to assert your rights under Art. 15 et seq. GDPR, please use the contact details for the companies of the Leica Camera Group listed in **Section 1.1** and in **Annex 1**.

Questions on the Grievance Procedure can also be directed to the customer support of the system operator, LegalTegrity, Platz der Einheit 2, 60323 Frankfurt am Main ("LegalTegrity") via email at support@legaltegrity.com or by telephone on +49 69 9999 88 38. If you contact LegalTegrity regarding the Grievance Procedure, LegalTegrity will process your personal data that you provide to LegalTegrity in the context of your enquiry under its own responsibility. Please contact LegalTegrity if you would like to receive further information on the Privacy Notice of LegalTegrity.

By contrast, LegalTegrity processes personal data on behalf of Leica Camera AG in the context of reports made through the Grievance Procedure (see **Section 6**).

Please note: If you submit your report through the Grievance Procedure anonymously, any subsequent contact regarding questions through the Grievance Procedure, data protection or the assertion of your rights could enable Leica Camera AG and any subsidiary contacted by you or involved in the processing to link your contact with your report and lead to you no longer being anonymous.

2 Data Protection Officer

You can contact the Data Protection Officer of Leica Camera AG at DPO@leica-camera.com. Where any subsidiaries have appointed a Data Protection Officer, you will find the contact details in Annex 1.

3 Subject of data protection

In accordance with Art. 4(1) GDPR, personal data means all information that relates to an identified or identifiable natural person. This may be, in particular, their name, or, for example, documented conduct that is connected with their person. Personal data is also referred to below simply as data.

4 When is your personal data processed?

We provide two channels for reports under the Grievance Procedure.

- The central channel is our digital <u>Grievance Procedure</u>.
- Alternatively, you can make a report by telephone via a hotline set up for this purpose (from Germany: +49 800 3800 999 and from elsewhere: +49 69 9999 8839).

For more information on how the Grievance Procedure works, please refer to our Rules of Procedure.

Your personal data is processed in the context of the Grievance Procedure in the following cases:

- When you visit the Grievance Procedure web page
- When you make a report yourself through our grievance channels or when you contact us using the contact details provided in <u>Section 1.1</u> or our subsidiaries using the contact details provided in <u>Annex 1</u> and you provide your name, email address or other information that can be linked to you as a person.
- When a link to you as a person results from or is made in conjunction with a report from a third
 party. The latter may happen if you yourself are accused of misconduct or you are mentioned
 by the whistleblower solely in conjunction with the alleged misconduct of another person, for
 example because you are named as a witness to the misconduct.

5 Automatic data collection

When you access the Grievance Procedure website, your end device automatically transfers the following data for technical reasons:

- Browser type and browser version
- · Operating system used
- Referrer URL
- Host name of the computer accessing the website
- Time of server request
- IP address

This data is only used to deliver the content of the Grievance Procedure website and to provide the website functions. This data is not saved or combined with other personal data that you transfer in the context of a complaint via the website.

The processing is required for the aforementioned purposes. This is also our legitimate interest pursuant to Art. 6(1)(f) GDPR.

6 How the Grievance Procedure works and how telephone reports are processed

The Grievance Procedure and the associated hotline are provided by the service provider LegalTegrity GmbH, Platz der Einheit 2, 60323 Frankfurt am Main ("LegalTegrity"). LegalTegrity processes personal data on behalf of Leica Camera AG, i.e. exclusively on the instructions of Leica Camera AG (under Art. 4(8) and 28 GDPR).

7 External ombudspersons for the receipt and (initial) assessment of reports

Reports made through the grievance channels and the data they contain, as well as supplementary information that the whistleblowers may provide on request, are collected directly by BDO Legal Rechtsanwaltsgesellschaft mbH, Fuhlentwiete 12, 20355 Hamburg ("BDO Legal") for initial viewing and initial assessment, and reviewed for the purpose of further investigation and resolution (e.g. proposed corrective actions).

BDO Legal processes your personal data under its own responsibility; Leica Camera AG is therefore not responsible for adherence to data protection laws by BDO Legal. Please contact BDO Legal if you would like to receive further information on the processing of your data by BDO Legal.

Following review and initial assessment, BDO Legal will pass on to Leica Camera AG any information on matters suggesting a specific breach of human rights and environmental obligations for further determination and processing.

8 Reports via the Grievance Procedure, including the hotline

8.1 Type of report

Regardless of how you submit your report, you as the whistleblower can choose whether to disclose your identity as the whistleblower with the report ("confidential report") or you wish to remain anonymous ("anonymous report").

a) Anonymous report

You can submit a report anonymously. In this case, your identity is not known to Leica Camera AG, the subsidiaries or suppliers that might be affected by the report, or BDO Legal.

Please note:

If you provide your email address at the end of the reporting process when submitting a report via the Grievance Procedure submission form, or where you contact the hotlines from a telephone number that can be traced back to you (e.g. a non-withheld number) when reporting by telephone, or where you provide information that allows conclusions to be drawn about you at another point in the reporting process, your report is no longer anonymous. When doing so, remember that conclusions can be drawn about you not only via your email address or telephone number and name, but also based on other information, in particular the content of the report.

You may inform BDO that you wish to disclose your identity only to BDO Legal. In this case, BDO Legal will pass on your report to Leica Camera AG only in anonymised form. The same applies if your report is passed on to a subsidiary. Where your personal data is also documented in the Grievance Procedure, the companies of the Leica Camera Group cannot access this information in the case of an anonymous report.

b) Confidential report (not anonymous)

When you make any other report, your personal data is disclosed to both BDO Legal and Leica Camera AG, specifically to the Compliance Office employees responsible for processing the report and (if necessary) to the specialist departments of Leica Camera AG for the purpose of investigating and following up on the report, including the development and implementation of appropriate corrective actions to prevent, terminate or mitigate the extent of any damage caused. In exceptional cases, your personal data may also be transferred to a subsidiary.

8.2 Reports via the Grievance Procedure submission form and the hotline

As a whistleblower, you can decide whether to submit your report via the Grievance Procedure submission form or by telephone via the hotline we have set up. LegalTegrity receives telephone reports via the hotline on behalf and on the instruction (under Art. 4(8) and 28 GDPR) of Leica Camera AG, transcribes them and forwards them to BDO Legal via the Grievance Procedure system.

a) Data for submitting the incident

When you submit a report through the grievance channels referred to above, you must provide the following information:

- Information on the category of incident being reported
- Indication of the company concerned
- Description of the incident being reported
- Location of incident
- Information about the persons involved
- Information on the involvement of local authorities

If you have selected that you wish to submit a confidential report, you must also provide your full name.

You also have the option of providing the following information:

- Your country
- Your job title
- Your telephone number
- Your email address.

Your telephone number will also be recorded if you submit your report by telephone via the hotline and do not withhold your number when you call. If you do not withhold your telephone number, but still want to submit your report anonymously, your telephone number will not be saved.

In addition, you have the option of providing additional information and uploading documents on the incident. You have the option of removing information that could identify you personally or anonymising such information before uploading/sending documents.

At the end of the process, you may enter your email address if you wish Leica Camera AG to inform you of the receipt and status of your report by email.

b) Access data for whistleblowers and additional information

Once you have submitted the report, you will see a reference number. You also need to enter a four-digit PIN. You can use the reference number and the PIN you have chosen at any time to find out the status of your report on the Grievance Procedure website, to add further information on your report, or to respond to queries, for example using the Grievance Procedure chat function, if applicable. If you have submitted your report via the hotline, the person you speak to will give you a reference number and an access code.

Please note that it is not possible to reset the access code or PIN. If you forget them, you will need to create a new report.

8.3 Responsibility under data protection law and purposes of data processing

Leica Camera AG is generally responsible for the processing described below. Only in exceptional cases do we share responsibility with the affected subsidiaries. Where such joint responsibility applies, please note the following:

a) Receipt of the report via the Grievance Procedure and hotline

Because Leica Camera AG is responsible for operating the Grievance Procedure, Leica Camera AG also bears responsibility under data protection law for receiving the report via the Grievance Procedure. However, BDO Legal, under its own responsibility, conducts the initial viewing and assessment of reports made, including further investigation and the development of proposed corrective actions to prevent, terminate or mitigate the extent of any damage caused. The same applies if the report is passed on to Leica Camera AG.

b) Receipt of the report following initial assessment by BDO Legal

Following initial examination, BDO Legal forwards the report, including the proposed corrective actions, to Leica Camera AG. Leica Camera AG processes the personal data contained in the report accordingly for the purpose of receiving and further assessing the report, including reports that relate to the business of a supplier, as well as for assigning the report to that company.

c) Corrective actions

We also process your personal data to determine and implement the corrective measures necessary to prevent, terminate or mitigate the damage.

d) Joint processing of reports

Where the report concerns subsidiaries of Leica Camera AG, Leica Camera AG and the affected subsidiaries process your personal data for the joint further investigation, coordination and implementation of the necessary corrective measures. This will involve the relevant information being exchanged between the affected subsidiaries and Leica Camera AG.

e) Processing of your email address and/or phone number to update you on your report

If you provided your email address and/or telephone number when making the report, BDO Legal or Leica Camera AG will process your email address and/or telephone number in order to inform you of receipt of the report and its processing status, or to contact you for further enquiries.

Leica Camera AG processes your personal data for the purpose of conducting the Grievance Procedure in order to fulfil our legal obligations under Section 8 LkSG. In addition, data is processed in order to fulfil our legal obligation under Section 7 LkSG to take corrective action.

Where subsidiaries of Leica Camera AG are also affected by a report, Leica Camera AG and the affected subsidiaries process your data under joint responsibility for the aforementioned purposes.

8.4 Disclosure of your personal data

a) Disclosure of your personal data to BDO Legal

As the investigations progress and in conjunction with the initiation of the required corrective action, Leica Camera AG may share supplementary information provided to us by whistle-blowers, witnesses or accused persons with BDO Legal on request for the purpose of further investigation.

b) Disclosure of your personal data to the competent authorities

Where this is necessary, in particular to fulfil our legal obligations (e.g. in connection with corrective action), we and, if applicable, the affected subsidiary, will transfer your personal data which we have received in the context of the report and the further investigation to the competent authorities (in particular law enforcement authorities, environmental authorities and regulatory supervisory authorities).

8.5 Lawful basis

a) Lawful basis for the processing **by Leica Camera AG**: Processing of the data of whistleblowers and other persons

The lawful basis for processing the personal data of whistleblowers and other persons (in particular accused persons or witnesses) is Art. 6(1)(c) GDPR in conjunction with Section 8 LkSG or in conjunction with Sections 7 and 17 LkSG.

Where the content of the report also contains the data of victims and thus data in the sense of Art. 9 and 10 GDPR (e.g. reports relating to prostitution), processing is justified in accordance with Art. 9(2)(g) or 10 Sentence 1 GDPR in conjunction with Section 8 LkSG or in conjunction with Sections 7 and 17 LkSG. Leica Camera AG is obligated to process the data.

In addition, Leica Camera AG has a legitimate interest in law enforcement, averting danger or prosecuting specific indications of criminal offences. The lawful basis is Art. 6(1)(f) GDPR. In the case of data in the sense of Art. 9 and 10 GDPR, the lawful basis is Art. 6(1)(f), 9(2)(f) or 10 Sentence 1 GDPR.

b) Lawful basis for the processing by the affected subsidiaries

The lawful basis for processing the personal data of whistleblowers and other persons (in particular accused persons or witnesses) is Art. 6(1)(f) GDPR. In the case of data in the sense of Art. 9 and 10 GDPR, the lawful basis is Art. 6(1)(f), 9(2)(f) or 10 Sentence 1 GDPR.

The affected subsidiaries have a legitimate and overriding interest in assessing and determining reports and complaints about the (potential) human rights-related or environmental

breaches under the LkSG. There is also a legitimate and overriding interest in taking corrective action measures to prevent, terminate or mitigate the extent of any damage caused.

In addition, the affected subsidiaries have a legitimate interest in law enforcement, averting danger or prosecuting specific indications of criminal offences.

Moreover, the affected subsidiaries also pursue the same interests as Leica Camera AG.

c) Processing of employee data by Leica Camera AG or the affected subsidiaries

Where the processing of personal data is necessary in order to uncover human rights-related or environmental offences or serious breaches of duty in relation to the employment relationship of accused employees of Leica Camera AG or its German subsidiaries, the lawful basis for processing by Leica Camera AG or the affected subsidiary as the employer is Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 of the German Data Protection Act ("BDSG"). In other cases, processing is based on the aforementioned legitimate interest in accordance with Art. 6(1)(f) GDPR.

Please note: For processing by Leica Camera Ltd. that falls within the scope of the UK GDPR, all references to the GDPR in this Section 8.5b)c) and below also apply to the UK GDPR.

9 False reports

If you make a false report, i.e. a clearly incorrect or untrue report, your personal data will be processed in order to initiate action against you, in particular measures under labour law.

In Germany, the lawful basis for the processing of your personal data by Leica Camera AG or the respective subsidiary as your employer is Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 BDSG, insofar as you are an employee of the affected company in the Leica Camera Group and the false report can be considered a serious breach of duty or criminal offence in relation to the employment relationship. In other cases, the lawful basis is the legitimate interest in accordance with Art. 6(1)(f) GDPR. The affected company of the Leica Camera Group has a legitimate interest in taking action against false reports and initiating corresponding measures.

10 Retention period

Leica Camera AG retains personal data in the context of a report and supplementary information for a period of seven years, starting from the time when the outcome of the investigation was communicated to the whistleblower, in addition to a two-month archiving period, if applicable. Where the report results in official or judicial/prejudicial proceedings, the retention period begins upon conclusion of the corresponding proceedings. The lawful basis for the data retention by Leica Camera AG is Art. 6(1)(c) in conjunction with Section 10(1) LkSG. The retention period is a legal obligation.

Data is only retained beyond this or by the subsidiaries where this is required in order to fulfil legal provisions under Art. 6(1)(c) GDPR or to assert, exercise or defend against legal claims. This is also the legitimate interest of Leica Camera AG or the affected subsidiary under Art. 6(1)(f) GDPR.

11 Contact using our contact details

If you send an enquiry (by email or post) to Leica Camera AG using the contact details provided in **Section 1.1**, e.g. with questions on data protection or how the Grievance Procedure works, the following data is processed:

- · Your name, if you provide it with your enquiry
- The time and date of your enquiry and the other information that you provide in your enquiry.

Depending on the way you choose to contact us and the contact details you provide:

- Your email address and/or
- Your postal address.

Processing is on the basis of the legitimate interest of Leica Camera AG or the affected subsidiary in accordance with Art. 6(1)(f) GDPR. There is a legitimate interest in the effective processing of your enquiry.

Your enquiries are erased as soon as they are no longer needed for the purpose for which they were collected. This is the case once your enquiry has been fully processed.

Please note: If you have submitted your report via the Grievance Procedure or the hotline anonymously, any subsequent contact regarding questions on the Grievance Procedure or data protection could result in your contact being linked with your report and you no longer being anonymous.

12 Cookies and similar technologies

On the Grievance Procedure website, Leica Camera AG uses cookies to allow it to offer certain functions of the Grievance Procedure. Cookies are small files saved on your end device via your internet browser. We also use local storage as a similar technology. Data is saved locally in your browser's cache. This data remains and can still be read even when you close the browser window or the program – unless you clear the cache (hereinafter referred to collectively as "cookies and similar technologies").

Leica Camera AG uses essential cookies and similar technologies exclusively for the operation and function of the Grievance Procedure website. These help to make the website technically accessible and usable and to offer basic key functions. For example, these cookies and similar technologies ensure that the Grievance Procedure website is protected against attacks and enable page navigation and access to secure areas of the website.

Leica Camera AG uses essential cookies without your consent in accordance with Section 25(2)(2) of the German Telecommunications Digital Services Data Protection Act ("TDDDG"). Where personal data from these cookies is processed, this processing occurs in order to ensure that the Grievance Procedure website and the associated functions can be used and to ensure the security of the website. This is also the legitimate interest of Leica Camera AG under Art. 6(1)(f) GDPR.

Personal data is deleted at the end of the day. It is not possible to identify the whistleblower from this data, nor is the data combined in order to identify the whistleblower.

13 Provision of your data

If you make a report, you as the whistleblower are not legally or contractually obligated to provide your personal data. On the contrary, you have the option of submitting your report anonymously.

Please note:

If you provide your email address at the end of the reporting process when submitting a report via the Grievance Procedure submission form, or where you contact the hotlines from a telephone number that can be traced back to you (e.g. a non-withheld number) when reporting by telephone, or where you provide information that allows conclusions to be drawn about you at another point in the reporting process, your report is no longer anonymous. When doing so, remember that conclusions can be drawn about you not only via your email address or telephone number and name, but also based on other information, in particular the content of the report.

In individual cases, removing all information that allows conclusions to be drawn about you can mean that the incident you have reported cannot be pursued, or only to a limited extent. In this case, you will be asked via the Grievance Procedure to provide further information. However, you are not obligated to fulfil this request.

Whistleblowers and other users are also not legally or contractually obligated to provide personal data, nor is the provision of this data required for contract conclusion.

However, the provision of the personal data to a certain extent is required in order to provide you with the functions and content of the Grievance Procedure to allow enquiries to be received and processed. Without the provision of your personal data, this is not possible, or only possible to a limited extent.

14 Origin of the data

If you are named in a report as the accused, a witness or another third party, or if conclusions about you result from a report, Leica Camera AG or the affected subsidiary will receive your personal data from the whistleblowers or, following initial assessment of the reports, from BDO Legal. Equally, BDO Legal will transfer your personal data to Leica Camera AG if you are the whistleblower (see <u>Section</u> <u>8.3</u>). You can find the categories of personal data about you that are processed in <u>Section a</u>).

Leica Camera AG also receives personal data from supplementary information and findings that arise during the investigation from BDO Legal or an affected supplier.

In the case of reports that also concern a Leica Camera AG subsidiary, the affected subsidiary or Leica Camera AG will receive:

- the aforementioned personal data on the whistleblowers, the accused, any witnesses and other third parties
- relevant supplementary information and findings that arise during the investigation

including through exchange of the relevant information between Leica Camera AG and the affected subsidiary, and from BDO Legal.

15 Disclosure of your data

Your data will be disclosed beyond that described in this Privacy Notice only to the following extent:

- a) Leica Camera AG and/or the affected subsidiaries will pass your data on to courts (as part of judicial and prejudicial proceedings) and external consultants (e.g. lawyers) for the following purposes:
 - in the case of specific indications of criminal offences for prosecution or averting danger;
 - for evidence and in order to assert, exercise or defend against claims.

Processing is on the basis of the aforementioned overriding legitimate interests, in accordance with Art. 6(1)(f) GDPR, or a legal obligation, in accordance with Art. 6(1)(c) GDPR.

In the case of criminal offences or serious breaches of duty by employees in relation to the employment relationship, the lawful basis for the transfer of the personal data of the employees of Leica Camera Group AG and its German subsidiaries is Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 BDSG. Otherwise, the lawful basis is Art. 6(1)(f) GDPR. The processing is required in order to pursue the aforementioned legitimate interests.

- d) Your personal data may also be disclosed if Leica Camera AG is subjected to third-party claims that include access to your data. This may be, in particular, claims by data subjects as part of the exercise of their rights under Chapter III of the GDPR.
 - Furthermore, personal data will be shared if you assert your data subject rights against Leica Camera AG and/or the subsidiaries, and these are jointly responsible for processing your personal data. This is necessary in order for Leica Camera AG and the subsidiaries to be able to exercise their rights in full. The lawful basis for processing in order to fulfil our legal obligation is Art. 6(1)(c) GDPR in conjunction with Art. 15 to 21 GDPR.
- e) Leica Camera AG and the affected subsidiaries rely on contractually bound external companies and service providers, known as processors (see Art. 4(8) and 28 GDPR), to process the reports and for the associated processes and investigations. In such cases, personal data is disclosed to these processors. These processors process personal data only within the scope of the corresponding order and are strictly bound by instruction.

In addition to the processor already mentioned in this Privacy Notice, the following categories of processors are used:

- IT service providers
- Cloud service providers
- Software service providers

16 Third country transfers

Where reports also affect a non-European subsidiary of Leica Camera AG, personal data may be transferred to the respective subsidiary based in a third country.

In this case, we guarantee that one of the following requirements is met:

- There is an adequacy decision by the EU Commission in accordance with Art. 45 GDPR, stating that there is an appropriate level of data protection in the third country. Specifically, we transfer personal data based on an adequacy decision of the EU Commission to the following companies in the Leica Camera Group:
 - Leica Camera AG (Switzerland)
 - Leica Camera Japan Co., Ltd. (Japan)
 - Leica Camera Ltd. (United Kingdom)
- Furthermore, we have concluded the standard data protection clauses approved by the EU Commission in accordance with Art. 46(2)(c) GDPR and taken supplementary measures in line with the criteria of the European Court of Justice (Schrems II judgement).
- Transfer to a third country may also occur if the subject of the report is a matter that requires cooperation with authorities in the affected third country. In this case, personal data is transferred on the basis of your consent (Art. 49(1)(a) GDPR or, where this is required for the assertion of, exercise of or defence against legal claims, Art. 49(1)(e) GDPR).

You can request further information using the contact details provided in <u>Section 1.1</u> or in <u>Annex 1.</u> There you can also request information on the suitable safeguards that we have provided in order to protect your personal data, including a copy of any standard data protection clauses concluded, if applicable.

17 Your rights

Under certain circumstances, you are entitled to the rights described below in relation to the processing of your personal data. You can assert your rights by submitting a request by post or email using the contact details provided in **Section 1.1** above or in **Annex 1**.

Please note: If you have submitted your report via the Grievance Procedure or the hotline anonymously, any subsequent contact in order to assert your rights could result in your contact being linked with your report and you no longer being anonymous.

17.1 Right of access

You have the right at any time to request access to your personal data processed by Leica Camera AG within the scope of Art. 15 GDPR.

17.2 Right to rectification of incorrect data

You have the right to demand that we immediately rectify incorrect personal data relating to you.

17.3 Right to erasure

In accordance with Art. 17 GDPR, you have the right to demand the erasure of the personal data relating to you.

17.4 Right to restrict processing

You have the right to demand the restriction of processing in accordance with Art. 18 GDPR.

17.5 Right to object

You have the right, for reasons resulting from your particular situation, to object in accordance with Art. 21 GDPR at any time to the processing of personal data relating to you, for example based on Art. 6(1)(e) or (f) GDPR. The processing of your personal data will then cease, unless we can prove compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves the assertion of, exercise of or defence against legal claims.

17.6 Right to data portability

You have the right to receive your personal data which you have provided to us; we will provide this in a structured, common, machine-readable format in accordance with Art. 20 GDPR.

17.7 Right of appeal

You have the right to contact a supervisory authority of your choice in the case of complaints.

17.8 Data processing in the exercise of your rights

The personal data transferred by you when exercising your rights under Art. 15 to 21 GDPR is processed for the purpose of exercising these rights and to enable proof of this to be provided and, if applicable, to defend legal positions. In this context, your data will be retained for three years following complete fulfilment of your data subject rights.

Leica Camera AG together with the subsidiaries is responsible for processing data to fulfil your rights, where the data is processed under joint responsibility. The lawful basis for processing for the purpose of implementation and proof of legally compliant implementation is Art. 6(1)(c) GDPR in conjunction with Art. 15 to 21 GDPR, as it is required in order to fulfil our legal obligation. Where the personal data is processed for purposes of legal defence, this is also the legitimate interest under Art. 6(1)(f) GDPR.

You are neither contractually nor legally obligated to provide your personal data. However, fulfilment of your request for the exercise of your data subject rights in accordance with Art. 12(2) Sentence 2 and 12(6) GDPR can be refused if you, on request if applicable, do not provide the data required to identify you uniquely.

Annex 1: Name and contact details, including contact details of the Data Protection Officer of the subsidiaries of Leica Camera AG (if applicable)

Leica - Aparelhos Ópticos de Precisão S.A.	Leica Camera Comercial, Unipessoal, LDA
Rua da Leica 55, 4760-810 Lousado, Vila Nova de Famalicão	Rua de Sá Bandeira 48/52, 4000-427 Porto
Portugal	Portugal
Private/confidential Local Compliance Representative	Private/confidential Local Compliance Representative
Email address: vitor.freitas@leica-camera.com	
	Email address: Paulo.Silveira@leica-camera.com
Leica Camera SARL	Leica Camera Italia S.r.l.
134 Rue du Faubourg Saint-Honoré, 75008 Paris	Via Mengoni 4, 20121 Milano
France Private/confidential	Italy Private/confidential Local Compliance Representative
Local Compliance Representative Email address: thomas.ribault@leica-camera.com	Email address: Vanessa.Bernocchi@leica-camera.com
Leica Smart Projection GmbH	LFI - Photographie GmbH
Am Leitz-Park 5	Burchardstraße 14, 20095 Hamburg
35578 Wetzlar	Germany

Germany	Private/confidential Local Compliance Representative
Private/confidential	
Local Compliance Representative	Email address: compliance@lfi-online.de
Email address: stephan.albrecht@leica-camera.com	
Leica Camera Austria GmbH	Leica Camera Deutschland GmbH
Annagasse 5, 1010 Vienna	Am Leitz-Park 5, 35578 Wetzlar
Austria	Germany
Private/confidential	Private/confidential
Local Compliance Representative	Local Compliance Representative
Email address: johannes.dietrich@leica-camera.com	Email address: nadine.zech@leica-camera.com
	Contact details of the Data Protection Officer: dpo@leica-camera.com
Leica Camera Iberia S.L.	Leitz-Park Marketing GmbH
Calle de José Ortega y Gasset nº34, 28006, Madrid,	Am Leitz-Park 6, 35578 Wetzlar
Spain	Germany
Private/confidential	Private/confidential
Local Compliance Representative	Local Compliance Representative
Email address: compliance.es@leica-camera.com	Email address: geraldine.pfeffer@leica-camera.com
Leica Eyecare GmbH	Leica Camera Classics GmbH
Am Leitz-Park 5, 35578 Wetzlar	Westbahnstraße 40
Germany	1070 Vienna,

Private/confidential Local Compliance Representative Email address: compliance@leica-eyecare.com	Austria Private/confidential Local Compliance Representative Email address: Alexander.Sedlak@leica-camera.com
Leica Camera Ltd.	Ernst Leitz Werkstätten GmbH
6-8 James Street, Marylebone	Am Leitz-Park 4
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