



ORLEN
AUSTRIA

Privacy policy

Pursuant to Art. 13 and 14 General Data Protection Regulation

Status March 2025

The protection of your personal data is very important to ORLEN Austria GmbH and its subsidiaries. In the following, we would like to briefly explain how we handle your personal data, what rights you have under applicable data protection law and how you can exercise them.

This privacy policy applies to contracts with the controller listed below, including the associated services and processing activities on the following topics:

- Energy supplies (fuel, electricity, gas and heating oil)
- Telecommunications services (e.g. Internet, telephony)
- Contracting (incl. associated contracts, rental or lease agreements)
- Other services and additional products (e.g. vouchers)

RESPONSIBLE OFFICE - CONTACT

The controller within the meaning of the General Data Protection Regulation (679/2016 EU) is

ORLEN Austria GmbH

Vogelweiderstraße 8, 4600 Wels

e-mail: office@orlen-austria.at

Tel: +43 7242 249-0

PROCESSING OF YOUR PERSONAL DATA

The personal data disclosed by you or received from third parties in the course of your contract or, if necessary, only in the course of pre-contractual activities (if no contract is concluded) will be processed to fulfil the respective contractual relationship,

including pre-contractual activities. This includes, for example

- Customer acquisition, supplier data, expressions of interest and recording of orders
- Processing of orders and contracts, processing of other products and services including any appointments, etc.
- Ongoing customer and supplier support, including processing tariff changes and discounts, providing advice and services
- Invoicing and payment processing,
- Transfer of energy efficiency measures within the meaning of the Federal Energy Efficiency Act,

- System installation and operation incl. troubleshooting, etc. We only process your data in accordance with the applicable legal provisions and this privacy policy in order to provide you with the products and services you have requested. We will only process your data beyond this with your consent in accordance with Art. 6 para. 1 lit. a GDPR or on the basis of a predominantly legitimate interest on our part in accordance with Art. 6 para. 1 lit. f GDPR or we will only use the data in anonymised form. The data processing of your personal data takes place on the basis of your contract. The disclosure of your personal data is necessary for the conclusion of the contract, as it is required for the fulfilment of the contractual relationship (provision of services, invoicing, etc.). Otherwise, we may not be able to fulfil our contractual obligations and therefore cannot conclude a contract with you.

We collect and process the following personal master data:



ORLEN
AUSTRIA

- First name
- Family name
- academic degree
- Residential address
- Date of birth
- Company
- Company register number
- Contact person
- E-mail address
- Telephone and fax number
- Other contact information
- Creditworthiness
- Information on the nature and content of the contractual relationship
- Payment modalities and payment receipts to record the contractual relationship

DATA COLLECTION BY THIRD PARTIES

We also process data that we have legitimately received from the following sources:

- Brokers or other sales partners in the course of sales activities (e.g. master data, contact data, consumption data)
- Service providers or other third parties in the course of sales or contract fulfilment activities (e.g. master data, contact data, consumption data)
- public registers (e.g. land register, company register, register of associations, media) or from address publishers or direct marketing companies (land register data, company register data, master data, contact data)
- Credit agencies on credit relationships in accordance with § 152 GewO (creditworthiness data, master data)
- Data from other third parties, provided a corresponding authorisation is available. In the case of energy supply contracts, we also receive data from the following sources:

Suppliers/grid operators and other third parties commissioned by you in the course of the registration/switching process for electricity and gas (e.g. master data, contact data, consumption data)

LEGITIMATE INTERESTS - PROCESSING FOR ANOTHER PURPOSE

Exchange of creditworthiness data - Receivables management

In the course of concluding a contract or during an ongoing contractual relationship, we have a legitimate interest in carrying out a manual or automatic credit check, including the transfer of data to a credit agency. We use your data to check your identity and to obtain information about your creditworthiness from credit agencies about credit relationships in accordance with § 152 GewO. If your credit rating is below a defined threshold, the contract will be rejected. In this case, you will be notified accordingly.

During the ongoing contractual relationship, we also have a legitimate interest in transferring your personal data to processors and other service providers (such as legal service providers, debt collection agencies, etc.) to enforce our claims arising from the contractual relationship if you do not fulfil your contractual obligations. In addition, payment history data on your undisputed claims that remain unpaid after the due date will be transmitted to credit agencies for lawful use in connection with their business authorisation pursuant to § 152 GewO.

Improving our products and services

In order to provide the best possible advice, we use your data stored with us for this purpose. In addition, we have a legitimate interest in continuously improving our products and services and therefore process



ORLEN
AUSTRIA

consultation results including results from questionnaires, customer correspondence and conduct opinion and satisfaction surveys with our customers by e-mail and telephone.

Online customer portal

If you use one of our customer portals, it is in our legitimate interest to store and use your usage data (e.g. time of last login, viewing and opening rates of invoices) to continuously improve our offers

Utilisation of energy efficiency measure

Furthermore, we have a legitimate interest in using energy efficiency measures in accordance with the Federal Energy Efficiency Act and also transferring these to third parties on the basis of civil law agreements within the scope of the legal possibilities.

Exchange of data between service providers

In order to fulfil contracts with third parties, it is in our legitimate interest to process the personal data received from them and to pass it on to service providers (e.g. passing on contact data to insurance companies, lawyers).

Market and opinion research.

It is in the legitimate interest of market and opinion research institutes to conduct market research and surveys for the purpose of scientific research. For this purpose, we transmit the contact data stored by you to market and opinion research institutes (as controllers within the meaning of the GDPR) on the basis of a public interest, which conduct scientific studies through surveys. The studies themselves are anonymised.

TRANSMISSION OF YOUR PERSONAL DATA

When transferring your personal data, we always ensure the highest possible level of security. Therefore, your data will only be passed on to carefully selected and contractually obligated processors. In addition, we will only transfer your data to third parties who are subject to strict EU data protection law or who are/have been obliged to comply with a corresponding level of protection. We will only transfer data to third countries outside the European Union if an adequacy decision has been issued by the European Commission for this third country or if we have agreed suitable and appropriate guarantees with the recipient.

DURATION OF THE STORAGE OF YOUR PERSONAL DATA

Your personal data will only be stored in our systems for as long as it is necessary for the fulfilment of the contractual relationship, is justified by the legitimate interest (this is e.g. up to 12 months after termination of the contract for market and opinion research) or a consent required for the storage of the data has been revoked by you. This does not apply to personal data that is required due to statutory retention periods (e.g. in accordance with § 212 UGB, §§ 132f BAO, §§ 123 and 126 GWG, §§ 76 and 81 ElWOG) and for the enforcement of legal claims. This data is not deleted, but is blocked from access in order to prevent access for other purposes. If these reasons no longer apply, this personal data will also be deleted or anonymised or pseudonymised.

In the event of a dispute, we will make your data available to the relevant body, e.g. the arbitration board of RTR or E-Control, and



ORLEN
AUSTRIA

store the data until the final decision is made.

CONSENT - REVOCATION

If your personal data is processed on the basis of your consent, you can revoke this consent at any time with effect for the future. You can send us your cancellation by e-mail to the e-mail address office@orlen-austria.at

YOUR RIGHTS IN CONNECTION WITH DATA PROTECTION

Right to information:

You can request confirmation from us as to whether and to what extent we process your data.

Right to rectification:

If your personal data that we process is incomplete or incorrect, you can request that we correct or complete it at any time.

Right to cancellation:

You can request that we erase your personal data if we process it unlawfully or if the processing disproportionately interferes with your legitimate protection interests. However, we would like to point out that there may be reasons that prevent immediate erasure, e.g. if we have to comply with statutory retention obligations.

Right to restriction of processing: You can request that we restrict the processing of your data in the following cases:

- if you contest the accuracy of the data, for a period enabling us to the accuracy of the data
- if the processing of the data is unlawful, but you refuse to have it erased and instead request that the use of the data be restricted

- if we no longer need the data for the intended purpose, but you still need this data for the assertion or defence of legal claims

- if you have objected to the processing of the data

Right to data portability

You may request that we provide you with your data in a structured, commonly used and machine-readable format, provided that

- we process this data on the basis of a consent given by you or - out of legitimate interest or the processing is necessary for the fulfilment of a contract, and

- the processing of your data is carried out using automated procedures.

Right of objection

If we process your data for the performance of tasks in the public interest, for the exercise of official authority or if we invoke the necessity to safeguard our legitimate interest in the processing, you can object to this data processing if there is an overriding interest in protecting your data. You can object to the sending of advertising at any time without giving reasons. However, we would like to point out that we are entitled to continue processing the data despite your objection if we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing serves the establishment, exercise or defence of legal claims.

Right of appeal:

If you are of the opinion that we are violating Austrian or European data protection law when processing your data, please contact us so that we can clarify any questions you may have.

To exercise your rights, please contact:

ORLEN Austria GmbH

Vogelweiderstrasse 8

4600 Wels

office@orlen-austria.at

+43 7242 249-0

In order to guarantee the protection of your rights and your privacy, we may request additional information to prove your identity if you assert one of the aforementioned rights. If you exercise one of the aforementioned rights manifestly without reason or particularly frequently, we may charge a reasonable processing fee for handling your request or refuse to process your request.

Of course, you also have the right to lodge a complaint with the Austrian data protection authority and with another supervisory authority within the EU.

Contact the responsible supervisory authority

Data protection authority

Tel: +43 1 52 152-0

www.dsb.gv.at

dsb@dsb.gv.at