



DATA PRIVACY INFORMATION FOR OUR CLIENTS AND BUSINESS PARTNERS OUR HANDLING OF YOUR DATA AND YOUR RIGHTS INFORMATION

ACCORDING TO ART. 13, 14 AND 21 OF THE GENERAL DATA PROTECTION REGULATION (GDPR) following we provide you with an overview of the processing of your personal data and your rights.

1. RESPONSIBLE FOR DATA PROCESSING AND CONTACT

Innovation Development Alliance Ltd.

info@idaLimited.com

2. DATA SOURCES

We process data that we acquire from the business relationship with you. We receive the data directly from you, e.g. when concluding a contract or placing an order, enquiries and consultations. Specifically, we process the following data: master data from the contract documents (e.g. name, address and contact data, bank details), data in connection with the performance of the contract (e.g. subject matter of the contract, billing address, method and manner of payment, contacts), correspondence (e.g. correspondence with you), advertising and sales data.

3. THE PURPOSE OF DATA PROCESSING

3.1. TO FULLFILL CONTRACTUAL OBLIGATIONS – ART. 6 (1) (B) GDPR

We process your data for the performance of our contracts with you, i.e. in particular for the processing of your orders and our services towards you. The purposes of the data processing depend in detail on the specific services and the contract documents.

3.2. FOR THE PURPOSES OF THE LEGITIMATE INTERESTS PURSUED BY US – ART. 6 (1) (F) GDPR

We may also use your data on the basis of a weighing of interests to protect our or third-party's legitimate interests. This is done for the following purposes:

- Assisting our employees in advising and serving business and in sales
- General business management and further development of services and products
- Advertising, market and opinion research
- Assertion of legal claims and defence in legal disputes
- Prevention and investigation of criminal offences
- Ensuring IT security and IT operations

Our interest in the respective processing results from the respective purposes and is of an economic nature in other respects (efficient performance of tasks, distribution, avoidance of legal risks). Insofar as the specific purpose permits, we process your pseudonymized or anonymized.

3.3. WITH YOUR CONSENT – ART. 6 (1) (A) GDPR

If you have given us your consent for the processing of personal data, the respective consent is the legal basis for the processing mentioned there. This applies in particular to your consent, if any, to the transfer of your data to our employees for consultation and support when concluding a contract. In addition, you may have agreed to be contacted by mail or telephone for advertising purposes. You can withdraw your consent at any time with effect for the future. This also applies to declarations of consent which you gave us before the GDPR came into effect, i.e. before May 25th 2018. The withdrawal only applies to future processing.

3.4. COMPLIANCE WITH LEGAL OBLIGATIONS – ART. 6 (1) (C) GDPR



We are subject to various legal obligations, i.e. legal requirements (e.g. commercial code, tax laws).

4. WHO RECEIVES MY DATA

A transfer of your data will only take place as far as a legal basis permits it. Within our company, those departments receive your data that require it to fulfil our contractual and legal obligations or to fulfil their respective tasks (e.g. sales and marketing). Furthermore, personal data may be passed on to affiliated companies (group companies) for the purpose of order processing. This is necessary for the fulfilment of contractual obligations. In addition, the following parties may receive your data:

- Processors used by us (Art. 28 GDPR), in particular in the area of IT services and logistics, which process your data for us in accordance with our instructions
- Public bodies and institutions (e.g. tax authorities) in the event of a legal or official obligation, and
- Other bodies for which you have given us your consent for data transfer

In order to assess the risk of concluding a contract, it is possible that we send your personal data to a credit agency or request information about you there. This transfer is permitted pursuant to Art. 6 (1f) DS-GVO because we pursue legitimate interests by limiting the economic risk. The credit bureaus evaluate the information collected by us and others and provide us with an assessment of the risk of default in individual cases.

5. DATA STORED

If necessary, we process your personal data for the duration of our business relationship, which also includes the initiation and performance of a contract. In addition, we are subject to various storage and documentation obligations, including those arising from the German Commercial Code (HGB) and the German Tax Code (AO). The time limits for storage and documentation specified therein vary between two and ten years. Finally, the storage period is also assessed according to the statutory limitation periods, which, for example, according to Sec 195 et seq. of the German Civil Code (BGB) can generally be three years, but in certain cases also up to thirty years.

6. DATA BE TRANSFERRED TO A THIRD COUNTRY

We do not intend to transfer personal data to third countries or international organizations. We only transfer your data to countries outside the European Economic Area – EEA (third countries) if this is necessary for the execution of our contractual relationship, required by law (e.g. accounting, administration), or if you have given us your consent.

Insofar as we use software from providers based in third countries or software from providers with subcontractors/service providers in third countries to carry out our contractual relationship, your data or parts of your data may – depending on the processing purpose – be transferred to third countries (e.g. to the United States of America).

We would like to point out that with the ineffectiveness of the EUUS Privacy Shield, there is currently no adequacy decision by the Commission for data transmission to the USA within for a sufficient level of data protection according to Art. 45 (3) GDPR. Therefore, we have concluded standard contractual clauses according to Art. 46 (2) (c) GDPR with the service providers/vendors we use, to protect your personal data. Furthermore, some of our service providers have implemented binding corporate rules (BCR) approved by the respective competent supervisory authority for their internal companies according to Art. 47 GDPR.



7. OTHER PRIVACY RIGHTS

In accordance with the relevant legal provisions, you have the right to information (Art. 15 GDPR, Sec. 34 of the Federal German Data Protection Act (FDPA) in its version effective by May 25th 2018), to rectification (Art. 16 GDPR), to erasure (Art. 17 GDPR, Sec. 35 FDPA), to restriction of processing (Art. 18 GDPR) and to data portability (Art. 20 GDPR). You also have the right to appeal to a data protection supervisory authority (Art. 77 GDPR, Sec. 19 FDPA).

8. OBLIGATION TO PROVIDE DATA

As part of our business relationship, you must only provide personal data that is required for the establishment, performance and termination of a business relationship or for which we are legally obliged to collect. Without this data we will normally have to refuse the conclusion of the contract or the processing of the order or will no longer be able to fulfil an existing contract and may have to terminate it.

9. IS THERE AN AUTOMATED INDIVIDUAL DECISION MAKING

We do not use automated individual decision making in accordance with Art. 22 GDPR for the conclusion and performance of the business relationship. If we decide to use these procedures in individual cases, we will inform you separately if this is required by law.

10. OBJECTION RIGHTS DO I HAVE – ART. 21 GDPR

10.1 RIGHT OF OBJECTION IN INDIVIDUAL CASES

You have the right to object at any time, for reasons arising from your specific situation, to the processing of personal data concerning you carried out pursuant to Art. 6 (1) (f) GDPR (data processing based on a weighing of interests). If you file an objection, we will no longer process your personal data unless we can prove compelling legitimate grounds for the processing which are worthy of protection and which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

10.2 RIGHT OF OBJECTION AGAINST THE PROCESSING OF DATA FOR PURPOSES OF DIRECT MARKETING

We may also process your data for direct marketing within the limits of the statutory provisions. At any time you have the right to object to the processing of your personal data for the purpose of such marketing. This also applies to profiling as far as it is connected with such direct marketing. If you object to the processing for purposes of direct marketing, we will no longer process your personal data for these purposes. The objection can be made without any formalities. You will find our contact details under no. 1.

11. Links

This privacy policy applies exclusively to IDA; it does not extend to third parties to whom we refer via our website. We have no influence on the data protection regulations of third parties linked to our websites. The operators of the linked websites are solely responsible for their content