



## DATA PROTECTION NOTES

In connection with the sending of our letter regarding a possible lease of your land to us and a possible subsequent contractual relationship, we will process certain personal data\* from you.

*\*("personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person)*

In the following, we would like to inform you about how we process your personal data.

### 1. Person responsible

The controller responsible for the processing of your personal data in connection with the sending of our letter regarding a possible lease of your land to us is :

**FRV Deutschland GmbH**, Brienner Str. 45 a-d, 80333 Munich ("**FRV**" or "**we**" or "**us**")

E-mail: [info.de@frv.com](mailto:info.de@frv.com)

### 2. General information on data protection

FRV as the controller of your personal data and its processing - within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter "GDPR") - takes the protection of your personal data very seriously and strictly adheres to the rules of data protection regulations.

Your personal data will only be processed by us to the extent that this is necessary. Under no circumstances will your personal data be passed on to third parties without your consent or without another legal basis.

Below we inform you about how we ensure the protection of your personal data and which types of personal data are processed for which purpose.

### 3. Technical and organizational measures at a glance

We use suitable technical and organizational security measures - including via our service providers, which we contractually oblige to comply with data protection - to protect your personal data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures and those of our service providers are continuously improved in line with technological developments. We therefore reserve the right to change these security and data protection measures if this becomes necessary due to technical developments.



## 4. Processing of personal data

### 4.1 Collection of parcel and ownership verification data

In order to find suitable areas for the development of solar parks, we collect so-called parcel and ownership data from property registers for those areas that we classify as fundamentally suitable. In the next step, the parcel data (so-called factual data) is then further evaluated in order to check whether the development of a solar park on the respective area makes sense. In this context, we process the following personal data from you:

- Information about you as the owner, i.e. name and address, and
- Parcel
- Location of the parcel,
- Size of the parcel,
- Public-law requirements of the parcel.

This personal data is processed on the basis of **Art. 6 para. 1 lit. f) GDPR**, whereby it is our legitimate interest to lease suitable areas for the development of solar parks in accordance with our corporate purpose.

We will only store your personal data mentioned in this section for as long as is necessary to check the suitability of your property or to contact you subsequently.

Insofar as we are obliged under applicable law to retain certain personal data for legally defined periods (e.g. in connection with business transactions), we will store this personal data for as long as necessary. In this case, the legal basis for the processing of personal data is Art. 6 para. 1 lit. c) GDPR. Your personal data will be deleted immediately if it is no longer required for the fulfillment of legal obligations.

We do not collect the personal data listed in this section directly from you, but from the authorities that administer the real estate registers. Without the processing of personal data, it is not possible for us to develop suitable areas.

### 4.2 Contact us by letter

In order to contact you by letter/post and inform you that we are interested in leasing your parcel of land (or part of it), we process the following personal data from you:

- Details of you as the owner, i.e. name and address.

This personal data is processed on the basis of **Art. 6 para. 1 lit. f) GDPR**, whereby it is our legitimate interest to contact you in accordance with our corporate purpose in order to lease suitable areas for the development of solar parks.



We will only store your personal data mentioned in this section for as long as is necessary to contact you. If we do not receive a reaction/response within 6 months after contacting you, both the personal data relating to you and the data relating to your parcel will be deleted.

Insofar as we are obliged under applicable law to retain certain personal data for legally defined periods (e.g. in connection with business transactions), we will store this personal data for as long as necessary. In this case, the legal basis for the processing of personal data is Art. 6 para. 1 lit. c) GDPR. Your personal data will be deleted immediately if it is no longer required for the fulfillment of legal obligations.

We do not collect the personal data listed in this section directly from you, but from the authorities that manage the real estate registers. Without the processing of personal data, it is not possible for us to contact you regarding a suitable plot of land.

#### 4.3 Contract initiation/contract

If you respond to our letter regarding a possible lease of your parcel of land or other contract-related processing, we will use your personal data to process or execute the contract-related inquiry or contract. The processing may also serve to settle disputes or enforce the contractual agreement. In this respect, we process the following data from you:

- Name and address,
- Contract data (including remuneration),
- Account data (account number, bank details).

We only store your personal data in accordance with this section for as long as is necessary for the provision of the services, the contractual relationship or the transmission of information that you have requested from us, as well as the management of the business relationship with you or the compliance check.

This data is processed in accordance with **Art. 6 para. 1 lit. b) GDPR**.

Insofar as we are obliged under applicable law to retain certain personal data for legally defined periods (e.g. in connection with business transactions), we will store this personal data for as long as necessary. In this case, the legal basis for the processing of personal data is Art. 6 para. 1 lit. c) GDPR. Your personal data will be deleted immediately if it is no longer required for the fulfillment of legal obligations.

We collect the personal data listed in this section (with the exception of name and address) directly from you by you providing the personal data yourself. The processing of personal data is necessary for us to implement the contract initiation or the contractual relationship regarding the lease of a suitable area.

## 5. How your personal data may be shared

We pass on your personal data to the following recipients:



As a rule, your personal data will only be transmitted if you have given your consent, if it is necessary for the establishment, execution or termination of a contractual relationship, or if it is necessary to safeguard the legitimate interests of the controller and there is no reason to assume that your interests worthy of protection outweigh the exclusion of processing or use or that there are legal obligations to transmit data.

Insofar as we transfer personal data to companies commissioned by us or cooperating with us, to our affiliated companies or to other third parties, we have agreements with these companies in accordance with applicable law, in particular in accordance with Art. 26 and 28 GDPR. Under these provisions, the other entities that process personal data undertake to ensure an adequate level of data protection. Please contact us in this regard; we will be happy to comply with your legitimate requests for information.

## **6. Automated decision making**

Automated decision-making does not take place.

## **7. Your rights**

You have the right to do so:

- to obtain information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you can request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection to processing, the existence of a right to object, the origin of your data if it was not collected by us, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;
- in accordance with Art. 16 GDPR, to immediately request the correction of incorrect or incomplete personal data stored by us;
- to demand the deletion of your personal data stored by us in accordance with Art. 17 GDPR, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- to demand the restriction of the processing of your personal data in accordance with Art. 18 GDPR if the accuracy of the data is disputed by you, the processing is unlawful, but you refuse to delete it and we no longer need the data, but you need it to assert, exercise or defend legal claims or you object to the processing in accordance with Art. 21 GDPR;
- in accordance with Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller



- in accordance with Art. 7 para. 3 GDPR, to withdraw the consent you have given us at any time. As a result, we may not continue the data processing based on this consent in the future; and
- to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our registered office. The supervisory authority responsible for the controller is

Bavarian State Office for Data Protection Supervision (BayLDA)  
Promenade 18, 91522 Ansbach  
Phone: +49 (0) 981 180093-0  
Fax: +49 (0) 981 180093-800

Further information on the respective responsibilities, activities and the processing of personal data by the supervisory authority can be found in the relevant information, e.g. at <https://datenschutz-hamburg.de>.

### **Right to object pursuant to Art. 21 GDPR**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (f) of Article 6(1) GDPR on grounds relating to your particular situation.

If we process personal data for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for the purpose of direct marketing, the personal data will no longer be processed for these purposes.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

To exercise your rights mentioned in this section, please use the contact details above.

## **8. Updating and amending this privacy policy**

These data protection notices are currently valid in the version dated June 2024.

It may become necessary to amend this data protection notice as a result of the further development of our services or due to changes in legal or official requirements. The current data protection information can be accessed and printed out at any time on the website at the following address:

[www.frv.com/de](http://www.frv.com/de)