

## **Data protection information for our customers and interested parties**

### **Information on data protection regarding the processing of customer and prospective customer data according to Art. 13 GDPR**

Thank you for your interest in our company, our products and our services. The protection of your personal data is a top priority for us. With the following information, we would like to inform you about how we handle your personal data during your interaction with our employees in detail:

#### **1. Name and contact details of the person responsible**

Responsible for the processing of your personal data in the context of this contact is

##### **Xentral ERP Software GmbH**

Viktoriastraße 3b  
86150 Augsburg  
E-Mail: [kontakt@xentral.com](mailto:kontakt@xentral.com)  
[www.xentral.de](http://www.xentral.de)

#### **2. Contact details of the data protection officer**

The designated data protection officer is

##### **DataCo GmbH**

Sandstrasse 33  
80335 München  
E-Mail: [datenschutz@dataguard.de](mailto:datenschutz@dataguard.de)  
[www.dataguard.de](http://www.dataguard.de)

#### **3. Processing of your personal data**

##### **a. Your personal data that is processed by us**

In the context of the prospective or existing customer relationship, we process the following personal data about you:

- First name
- Surname
- Salutation
- Title and academic degrees
- Company name
- Position in the company
- Business address
- Bank account details

- Tax ID
- Customer number
- Your email address
- Your mobile phone number
- Your landline number
- Your fax number
- Assigned role within our software and the associated authorisations
- All personal data provided to us in the context of customer communication

In connection with the initiation or maintenance of business relationships, we may, to the extent permitted by law, also process business contact details and company information obtained from external sources. This may include, in particular, business email addresses, business telephone numbers, information about companies, roles and responsibilities, information relating to the professional context, as well as company-related information, insofar as such information is relevant for contacting, qualifying and supporting prospects and customers.

We collect data from interested persons and customers in the following ways:

- Inquiries via the contact form on the Xentral website
- Inquiries by message to Xentral employees, e.g. by email, LinkedIn Messages or other communication channels.
- Inquiries at trade fairs or other events at which data is passed on to Xentral employees with the goal of establishing contact.
- Own research on potential interested parties in industry directories, contact details on websites or professional networks
- Independent booking of an appointment for an interested person.
- Requesting personal data from the person themselves after concluding a contract with Xentral or receiving personal data from an employee of the customer company.
- Entry of personal data of employees by an administrative employee of the customer in the Xentral software.
- From Dealfront Group GmbH, Durlacher Allee 73, 76131 Karlsruhe, Germany.
- Via the Clay platform as well as third-party data sources and data providers integrated into Clay, through which business contact details and company-related information are provided for the identification, enrichment, validation and prioritisation of relevant contacts and companies.

## **b. Purposes of data processing**

In the context of the initiating or existing customer relationship, your personal data will be processed for the following purposes:

- To process your enquiry as an interested party. For this purpose, we use your contact details to answer your enquiry.
- To prepare and carry out pre-contractual measures - this includes, for example, the preparation and sending of a customized offer or individual agreement and transmission of contractual conditions with the aim of concluding a contract.
- To add your contact details to our customer database.
- To make contact (email, telephone)
- To establish, execute and terminate the contractual relationship.

- For customer administration and customer support - in particular the processing of customer enquiries via email / our ticket system or telephone.
- To provide you with the best possible information about our products and services. This also includes sending (direct) advertising by email or post.
- To ensure smooth billing of the services provided. For this purpose, your personal data is processed in order to be able to issue invoices.
- For the purpose of sending newsletters, if you have registered for our newsletter.
- To find out how satisfied you are with our products and services
- For conducting product tests
- To fulfill our legal obligations. This includes, for example, the transmission of your personal data to the tax office.
- For the purpose of carrying out marketing initiatives such as: Sending newsletters, product updates, invitations to events and webinars
- For the fulfillment of post-contractual measures
- For the purpose of performing credit checks
- For the assertion, exercise or defense of legal claims.
- For the provision of AI-supported features and the Xentral AI Agent.

### **c. Legal basis for data processing**

#### **Processing of your personal data on the basis of consent**

Insofar as we obtain your consent for the processing of your personal data, your personal data will be processed on the basis of Art. 6 para. 1 sentence 1 lit. a GDPR in conjunction with Art. 5, 7 GDPR. Art. 5, 7 GDPR.

#### **Processing for the purpose of performing the contract with you**

Insofar as we process your personal data for the purpose of contract fulfillment, Art. 6 para. 1 sentence 1 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre- and post-contractual measures.

#### **Processing for the fulfillment of a legal obligation**

Insofar as the processing of your personal data is necessary to fulfill a legal obligation to which our company is subject, Art. 6 para. 1 sentence 1 lit. c GDPR serves as the legal basis. Our legal obligation to process data arises from retention obligations under tax and commercial law.

#### **Processing on the basis of legitimate interest**

The legal basis for direct marketing purposes may be Art. 6 para. 1 sentence 1 lit. f GDPR if our legitimate interests exist, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, prevail. The legitimate interests pursued by us in this regard - in addition to the purposes listed under b. - include

- To inform you in the best possible way about our products, offers and services by means of direct marketing,
- In communication with you, in particular to answer your enquiries by email or telephone,
- To obtain customer feedback to improve the customer experience, improve our products and services.

The legal basis for processing activities in connection with the assertion, exercise or defense of legal claims is also our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR.

#### **Processing for the provision of AI-supported features**

Where we process personal data for the provision of AI-supported features and the Xentral AI Agent within the scope of the contractual relationship with our customers, such processing is carried out on the basis of Art. 6(1) sentence 1 lit. b GDPR. Where processing is necessary to

ensure security, for error analysis, prevention of misuse, or the establishment, exercise or defence of legal claims, the processing is carried out on the basis of Art. 6(1) sentence 1 lit. f GDPR.

**d. Information on data not collected directly from the data subject (Art. 14 GDPR)**

Where we do not collect personal data directly from the data subject, but obtain it from external sources, this may in particular concern business contact details, information on professional role, company information, and other company-related information that we receive via Clay or third-party data sources and data providers integrated therein. The processing is carried out for the purpose of identifying suitable contacts, initiating and maintaining business relationships, as well as validating and updating business contact details. The legal basis is, where applicable, Art. 6(1) sentence 1 lit. f GDPR.

Where personal data has not been collected from the data subject directly, we provide the information required under Art. 14 GDPR in accordance with the requirements of the GDPR.

**4. Recipients or categories of recipients of the personal data**

As part of the processing of your personal data, we may pass on your personal data to the following recipients. We only transfer your personal data to external recipients if you have given your consent or if this is permitted by law. External recipients of your personal data are in particular

- Freelancer
- Processors
- Authorities, e.g. tax offices, courts, trade supervisory office, data protection supervisory authorities, Federal Office of Economics and Export Control (BAFA)
- Billing partners
- Debt collection companies
- Credit institutions
- Parcel service providers
- Post office
- Lawyer, tax consultant
- Auditor
- Associated companies

Your personal data will be transmitted to the following service providers:

Subcontractor	Contact details	Purpose
Amazon Web Services EMEA	SARL 38 Avenue John F. Kennedy, L-1855 Luxembourg aws.amazon.com	Hosting, Infrastructure, platform
Planhat AB	Regeringsgatan 29, 111 53 Stockholm, Sweden	Onboarding/support system
Looker	Google Cloud EMEA Limited 70	Analysis software for demo

	Sir John Rogerson's Quay, Dublin 2, Ireland	and software use
Hubspot Germany GmbH	Am Postbahnhof 17 10243 Berlin	Inbound marketing, CRM and sales platform
Debtist GmbH	Mittelberg 9 67098 Bad Dürkheim	Debt collection
OpenAI Ireland Ltd	1st Floor, The Liffey Trust Centre, 117–126 Sheriff Street Upper Dublin 1, Ireland	AI model/API services
Google Cloud EMEA Limited (Gemini)	70 Sir John Rogerson's Quay Dublin 2 Ireland	AI model/API services
Anthropic PBC	548 Market Street, PMB 90375 San Francisco, CA 94104 United States	AI model/API services
Clay Labs Inc.	111 W 19th Street, New York, NY 10011, USA	Data enrichment, validation and structuring of business contact details.

Xentral uses the Gmail service, including GoogleMeet, for the purpose of business communication with customers and interested parties.

In addition, your personal data may be transferred to the following service providers based in a country outside the EU/EEA:

- Atlassian (Jira Ticket System), Level 6, 341 George Street Sydney NSW 2000, Australia

In the case of processors and service providers outside the EU/EEA, your above-mentioned personal data will only be processed if this is the subject of our data processing agreement with these recipients in accordance with Art. 28 GDPR. In order to make the transfer to third countries as data protection-friendly as possible, standard contractual clauses have been concluded with providers in unsafe third countries in accordance with Art. 46 para. 2 lit. c GDPR. A copy of the standard contractual clauses can be requested by sending an informal email to [kontakt@xentral.com](mailto:kontakt@xentral.com).

The following service providers in the USA have joined the Trans-Atlantic Data Privacy Framework (TDPF; data protection agreement between the EU and the USA), so that an appropriate level of data protection is guaranteed for data processing:

- Zendesk Inc, 989 Market St, San Francisco, USA (Ticket-System)
- Chargebee, 340 S Lemon Avenue, 1537, Walnut, California 91789, USA (Subscription management and invoicing platform)

## 5. Specific information on the provision of AI-supported features

We offer our customers AI-supported features as well as the Xentral AI Agent. Where customers or users authorised by them use these features, we process personal data for the purpose of providing, performing, securing, analysing errors in and technically supporting the respective feature.

This may include, in particular, content entered by the user, documents provided, data available in the respective Xentral instance or accessible via connected systems, generated outputs, as well as technically required log and metadata, insofar as this is necessary for the provision of the respective feature.

Depending on the respectively activated scope of functionality and the interfaces enabled by the customer, the Xentral AI Agent may analyse, structure and generate content and access data within the Xentral instance and connected systems, insofar as this is necessary to perform the respective requested function.

For the provision of AI-supported features, external AI model, API or infrastructure service providers are used, in particular OpenAI, Google (Gemini) and Anthropic. Their integration is carried out exclusively in accordance with data protection requirements and, where necessary, on the basis of a data processing agreement or other appropriate data protection safeguards.

The Xentral AI Agent does not make any solely automated decisions producing legal effects or similarly significantly affecting individuals within the meaning of Art. 22 GDPR.

## **6. Duration of storage of personal data**

We do not store your personal data for longer than is necessary for the purpose for which it was collected. This means that data is destroyed or deleted from our systems as soon as it is no longer required. We take appropriate measures to ensure that your personal data is only processed under the following conditions:

- For the duration that the data is used to provide you with a service
- As required by applicable law, contract or in light of our legal obligations
- Only for as long as necessary for the purpose for which the data was collected, or longer if required by contract, applicable law, using appropriate safeguards.

A requirement may exist in particular if the data is still needed to fulfil contractual services, to check and grant or defend against warranty and guarantee claims. If the data is no longer required for the fulfilment of contractual or legal obligations, it is regularly deleted, unless its - temporary - retention is still necessary, in particular to fulfil legal retention periods of up to ten years (e.g. from the German Commercial Code, the German Fiscal Code and the German Money Laundering Act). In the case of statutory retention obligations, deletion will only be considered after expiry of the respective retention obligation.

## **7. Rights of data subjects**

According to the General Data Protection Regulation, you have the following rights:

- If your personal data is processed, you have the right to obtain information from the controller about the personal data stored about you (Art. 15 GDPR).
- You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you and the right to have incomplete personal data completed (Art. 16 GDPR).
- If the legal requirements are met, you can request the erasure or restriction of processing (Art. 17 and 18 GDPR)
- If you have asserted the right to rectification, erasure or restriction of processing against the controller, the controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or involves a disproportionate effort. You have the right to be informed about these recipients by the controller (right to information, Art. 19 GDPR).
- If you have consented to the data processing or a contract for data processing exists and the data processing is carried out using automated procedures, you may have a right to data portability (Art. 20 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 (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. The controller will no longer process the personal data concerning you unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims (Art. 21 (1) GDPR).
- If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing. If you object to processing for direct marketing purposes, the personal data concerning you will no longer be processed for such purposes.
- You have the right to revoke your declaration of consent under data protection law at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal (Art. 7 (3) GDPR).
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. In this case, if the legal requirements are met, you have the right to obtain human intervention on the part of the controller, to express your point of view and to contest the decision (Art. 22 GDPR).
- Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the GDPR (Art. 77 GDPR). The supervisory authority with which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

The supervisory authority responsible for us is the Bavarian State Office for Data Protection Supervision. You can contact them at

Bavarian State Office for Data Protection Supervision

House address

Promenade 18

91522 Ansbach

Ansbach, Germany

Telephone: +49 (0) 981 180093-0

Fax: +49 (0) 981 180093-800

E-mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

If the legal requirements are met, you can object to the processing of personal data concerning you at any time for reasons arising from your particular situation, which is carried out on the basis of Art. 6 para. 1 lit. e or f GDPR (Art. 21 GDPR).

## **8. Obligation to provide the data**

For a (planned) conclusion and execution of the contract with you, you must provide the personal data that is necessary for the establishment and execution of the contractual relationship and the fulfillment of the associated contractual obligations or that we are legally obliged to collect. This obligation also arises from the law, e.g. § 14 UstG. Without this data, we will generally not be able to conclude and fulfill the contract with you.