E-BIKE SYSTEM
INTEGRATION

Rotax Bike Technology AG's obligation to provide information

We hereby inform you how we handle your personal data, which we collect and store in the context of the contractual relationship. Personal data is information that relates to you and can lead to your identification. These notices are designed to meet the requirements of the EU General Data Protection Regulation (GDPR) and the revised Swiss Data Protection Act (FADP). Where only one of the two laws expressly applies, you can find this in the data protection notice.

Description	**Collection of personal data from you (direct collection)**	**Collection of your personal data via third parties (third-party collection)**
Names and contact details of the controller, the controller's representative and any data protection officer	Person in charge: Rotax Bike Technology AG represented by the managing directors: Dr. Fouad Bennini, Manuel Jonas Bracher and Thomas Raith Schwende 1 CH-4950 Huttwil Phone: +41 62 959 5300 E-mail: info@fit-ebike.ch Representative according to Art. 27 GDPR: Rotax Bike Technology Europe GmbH represented by the managing directors: Dr. Fouad Bennini and Heiko Schorr Im Höning 5 DE-63820 Elsenfeld Phone: +49 60227067211 E-Mail: germany@fit-ebike.ch Data protection supervisor: Eric Drissler ED Computer & Design GmbH & Co. KG Lina-Bommer-Weg 4 DE-51149 Cologne Phone: +49 221 28887766 E-mail: datenschutz@edcud.de	Person in charge: Rotax Bike Technology AG represented by the managing directors: Dr. Fouad Bennini, Manuel Jonas Bracher and Thomas Raith Schwende 1 CH-4950 Huttwil Phone: +41 62 959 5300 E-mail: info@fit-ebike.ch Representative according to Art. 27 GDPR: Rotax Bike Technology Europe GmbH represented by the managing directors: Dr. Fouad Bennini and Heiko Schorr Im Höning 5 DE-63820 Elsenfeld Phone: +49 60227067211 E-Mail: germany@fit-ebike.ch Data protection supervisor: Eric Drissler ED Computer & Design GmbH & Co. KG Lina-Bommer-Weg 4 DE-51149 Cologne Phone: +49 221 28887766 E-mail: datenschutz@edcud.de
Purpose of the processing (FADP and GDPR) and legal bases according to GDPR	The data is collected for the purpose of ▪ Sales and order processing on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Spare parts storage and deliveries in customer service on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Customer service for merchants on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Finance and Controlling on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ Credit check on the legal basis of 6 para. 1 sentence 1 lit. f GDPR for economic interest to minimise risk ▪ Maintenance Tool on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ QA-Cloud on the legal basis of 6 para. 1 sentence 1 lit. b GDPR due to warranty-claims, 6 para. 1 sentence 1 lit. c GDPR due to warrantyclaims, Art. 6 para. 1 sentence 1 lit. f GDPR for reasons of benchmarking and quality assurance ▪ PM tool on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ Collection and transmission of telemetry data on the legal basis of 6 para. 1 sentence 1 lit.	The data is collected for the purpose of ▪ Sales and order processing on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Spare parts storage and deliveries in customer service on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Customer service for merchants on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR ▪ Finance and Controlling on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ Credit check on the legal basis of 6 para. 1 sentence 1 lit. f GDPR for economic interest to minimise risk ▪ Maintenance Tool on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ QA-Cloud on the legal basis of 6 para. 1 sentence 1 lit. b GDPR due to warranty-claims, 6 para. 1 sentence 1 lit. c GDPR due to warrantyclaims, Art. 6 para. 1 sentence 1 lit. f GDPR for reasons of benchmarking and quality assurance ▪ PM tool on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ Collection and transmission of telemetry data on the legal basis of 6 para. 1 sentence 1 lit. f

	f GDPR out of economic interest for further development and guarantee assurance ▪ Purchasing on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ IT and communication technology operation and support on the legal basis of 6 para. 1 sentence 1 lit. b GDPR, Art. 6 (1) sentence 1 lit. f GDPR to optimize and ensure process flows ▪ Recruitment of new employees and interns on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR	GDPR out of economic interest for further development and guarantee assurance ▪ Purchasing on the legal basis of 6 para. 1 sentence 1 lit. b GDPR ▪ IT and communication technology operation and support on the legal basis of 6 para. 1 sentence 1 lit. b GDPR, Art. 6 (1) sentence 1 lit. f GDPR to optimize and ensure process flows ▪ Recruitment of new employees and interns on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR
Category of data (depending on processing status and contact type)	-	<u>In the context of sales and order processing:</u> Master and contact data, quantity, article, conditions, optional end customer name/commission (for dealer orders) <u>As part of spare parts storage and deliveries in customer service:</u> Master and contact data, quantity, article, optional end customer name, freight instructions (delivery times, etc.) <u>As part of the customer service for dealers:</u> Master and contact data, frame number/serial numbers, sales receipt of the dealer, error description, shipping data <u>In the context of finance and controlling:</u> Master contact data, booking data, bank data, ERP data, contract data, tax documents, salary data <u>As part of the credit check:</u> Reference data <u>As part of the Maintenance Tool:</u> Serial numbers of the installed FIT components, frame number, digital key / ownership card (QR code printed on card), article number of the bike model, all firmware versions on the bike, production date, ID of the manufacturing employee (login credentials), compatibility tables hardware/firmware, firmware binaries, bike model names, pictures of the bike models, bike specifications, service/repair processes incl. time stamp, component replacement, ID of the processing dealer (Login Credentials), Telemetry Data <u>As part of the QA-Cloud:</u> Component serial number, test/diagnostic reports, condition data (partly historical), firmware status (historical), warranty period, production date, reference to bike frame number(s), warranty status <u>As part of the PM tool:</u> Rights and role concept, login data, item number of bike models, statistical distribution of firmware levels in the field, distribution of bike models in the field, bike model designations, pictures of bike models, bikespecifications, FIT system configurations (motor, battery, display,

		remote/HMI, cables, electronic drivetrains, ...), bikespecification (fork, saddle, wheel, tires, ...) As part of the collection and transmission of telemetry data: Location data (GPS), battery health and usage, temperature (CPU, battery), usage behavior (click behavior, Bluetooth usage, lighting, driving behavior, ride times, selected motor assistance, time format, language), frame number, error codes/events As part of purchasing: Master and contact data, order history, current orders, delivery documents and invoices, contracts As part of IT and communication technology, operation and support: Rights and roles, e-mail data, usagebehaviour / usage data, all types of documents, personnel data/documents, process documentation, account data, image data, master and contact data, contract data, time bookings, access data, telephone communication data and other metadata, bank and payment data, telemetry data from vehicles, user usage data As part of the recruitment of new employees and interns: Master and contact data, curriculum vitae/CV, job references, photograph if applicable
Category of recipients of data	In the context of sales and order processing: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and accounting) As part of spare parts storage and deliveries in customer service: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and logistics), transport companies, parcel services, customs As part of the customer service for dealers: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and logistics), transport companies, parcel services, customs In the context of finance and controlling: Processors (IT service providers, Microsoft 365, e-mail service providers, ERP providers, cloud telephone systems, financial service providers), banks, audit offices, tax authorities, authorities (statistical office, customs, etc.), insurance companies As part of the credit check: Processor (IT service provider, Microsoft 365, e-mail service provider, ERP provider, cloud	In the context of sales and order processing: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and accounting) As part of spare parts storage and deliveries in customer service: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and logistics), transport companies, parcel services, customs As part of the customer service for dealers: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone system, back office and logistics), transport companies, parcel services, customs In the context of finance and controlling: Processors (IT service providers, Microsoft 365, e-mail service providers, ERP providers, cloud telephone systems, financial service providers), banks, audit offices, tax authorities, authorities (statistical office, customs, etc.), insurance companies As part of the credit check: Processor (IT service provider, Microsoft 365, e-mail service provider, ERP provider, cloud

	telephone system, financial service provider), Creditreform, debt collection office As part of the Maintenance Tool: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers) As part of the QA-Cloud: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers) As part of the PM tool: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers), customers/OEM bike manufacturers As part of the collection and transmission of telemetry data: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers), network providers, customers/OEM bike manufacturers As part of purchasing: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone systems, purchasing service providers) As part of IT and communication technology, operation and support: Processors (development service providers, IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone systems, cloud hosters, software providers) As part of the recruitment of new employees and interns: Processors (IT service providers, Microsoft 365, e-mail service providers, cloud telephone system, personnel service providers)	telephone system, financial service provider), Creditreform, debt collection office As part of the Maintenance Tool: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers) As part of the QA-Cloud: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers) As part of the PM tool: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers), customers/OEM bike manufacturers As part of the collection and transmission of telemetry data: Processors (IT service providers, Microsoft 365, cloud hosters, development service providers), network providers, customers/OEM bike manufacturers As part of purchasing: Processors (IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone systems, purchasing service providers) As part of IT and communication technology, operation and support: Processors (development service providers, IT service providers, Microsoft 365, email service providers, ERP providers, cloud telephone systems, cloud hosters, software providers) As part of the recruitment of new employees and interns: Processors (IT service providers, Microsoft 365, e-mail service providers, cloud telephone system, personnel service providers)
FADP: Disclosure of personal data abroad to a state or an international body and, where applicable, the safeguards under Article 16 (2) FADP or the application of an exception under Article 17 FADP **GDPR:** transfers of personal data to a third country or to an international organisation, as well as the existence or absence of an adequacy decision by the Commission or, in the case of transfers pursuant to Article 46 or Article 47 or the second subparagraph of Article 49(1), a reference to the	Service providers for Microsoft 365: Microsoft Corporation Inc. One Microsoft Way Redmond, WA 98052-6399 United States Microsoft Corporation Inc. is certified under the EU-US Data Privacy Framework, adequacy decision of the EU Commission (Art. 45 para. 1 GDPR). See under https://www.dataprivacyframework.gov/s/participant-search In addition, we have agreed standard contractual clauses with Microsoft Corporation in accordance with Art. 16 (2) (d) DSG. For more information, see https://learn.microsoft.com/de-de/compliance/regulatory/offering-eu-model-clauses	Service providers for Microsoft 365: Microsoft Corporation Inc. One Microsoft Way Redmond, WA 98052-6399 United States Microsoft Corporation Inc. is certified under the EU-US Data Privacy Framework, adequacy decision of the EU Commission (Art. 45 para. 1 GDPR). See under https://www.dataprivacyframework.gov/s/participant-search In addition, we have agreed standard contractual clauses with Microsoft Corporation in accordance with Art. 16 (2) (d) DSG. For more information, see https://learn.microsoft.com/de-de/compliance/regulatory/offering-eu-model-clauses

appropriate or adequate safeguards and the possibility of obtaining a copy of them; or where they are available	Collaboration tool service provider Atlassian: Atlassian Pty. 350 Bush St. Floor 1304104 San FranciscoUSA Atlassian Pty. is certified under the EU-US Data Privacy Framework, adequacy decision of the EU Commission (Art. 45 para. 1 GDPR). See under https://www.dataprivacyframework.gov/s/participant-search In addition, we have agreed standard contractual clauses with Atlassian Pty. in accordance with Art. 16 para. 2 lit. d FADP. For more information, see https://www.atlassian.com/de/trust/privacy/latest-updates/international-data-transfers All other processors are based in Switzerland or Germany. The adequacy decision of the EU Commission pursuant to Art. 45 (1) GDPR applies to Switzerland. For more information, see https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32000D0518&from=MT Germany is a country with adequate data protection. For more information, see https://www.fedlex.admin.ch/eli/cc/2022/568/de#annex_1	Collaboration tool service provider Atlassian: Atlassian Pty. 350 Bush St. Floor 1304104 San FranciscoUSA Atlassian Pty. is certified under the EU-US Data Privacy Framework, adequacy decision of the EU Commission (Art. 45 para. 1 GDPR). See under https://www.dataprivacyframework.gov/s/participant-search In addition, we have agreed standard contractual clauses with Atlassian Pty. in accordance with Art. 16 para. 2 lit. d FADP. For more information, see https://www.atlassian.com/de/trust/privacy/latest-updates/international-data-transfers All other processors are based in Switzerland or Germany. The adequacy decision of the EU Commission pursuant to Art. 45 (1) GDPR applies to Switzerland. For more information, see https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32000D0518&from=MT Germany is a country with adequate data protection. For more information, see https://www.fedlex.admin.ch/eli/cc/2022/568/de#annex_1
Duration of storage	Internal accounts are deactivated when the employee leaves, deleted after 3 months at the latest. 6 months after completion of the application process, applications from employees who have not been hired will be deleted. Service tickets 7 years starting at the end of the financial year Tax documents, business books, accounting documents as well as annual reports, audit reports 10 years starting with the end of the financial year Business documents required in connection with the calculation of contribution taxation and own use of immovable property 20 years starting from the end of the financial year The data only refers to the frame number, it is not automatically deleted. The end customer (vehicle user) can initiate the deletion if desired, then all data stored for the frame number will be deleted. In some cases, the data is stored in overwrite mode, e.g. the current status is only overwritten. Processors are required to hand over the data to the controller at the end of the contract or to	Internal accounts are deactivated when the employee leaves, deleted after 3 months at the latest. 6 months after completion of the application process, applications from employees who have not been hired will be deleted. Service tickets 7 years starting at the end of the financial year Tax documents, business books, accounting documents as well as annual reports, audit reports 10 years starting with the end of the financial year Business documents required in connection with the calculation of contribution taxation and own use of immovable property 20 years starting from the end of the financial year The data only refers to the frame number, it is not automatically deleted. The end customer (vehicle user) can initiate the deletion if desired, then all data stored for the frame number will be deleted. In some cases, the data is stored in overwrite mode, e.g. the current status is only overwritten. Processors are required to hand over the data to the controller at the end of the contract or to

	destroy it in accordance with data protection regulations.	destroy it in accordance with data protection regulations.
Right to information	You have the right to request information about your data stored by us at any time.	You have the right to request information about your data stored by us at any time.
Right to rectification or deletion of data	In the event that this data has been stored incorrectly or incompletely, you have the right to request correction or deletion.	In the event that this data has been stored incorrectly or incompletely, you have the right to request correction or deletion.
Entry of a notice of contestation pursuant to Art. 32 para. 3 FADP	If neither the accuracy nor the inaccuracy of the personal data in question can be established, the plaintiff may demand that a denial note be affixed.	If neither the accuracy nor the inaccuracy of the personal data in question can be established, the plaintiff may demand that a denial note be affixed.
Right to restriction of processing	You may request the restriction of processing if you contest the accuracy of the data collected, the processing is unlawful or the purpose of the processing is fulfilled.	You may request the restriction of processing if you contest the accuracy of the data collected, the processing is unlawful or the purpose of the processing is fulfilled.
Right to withdraw consent	If the processing of your personal data for a specific purpose is based on your consent, you can withdraw it at any time; however, until the time of your revocation, the data processing remains lawful.	If the processing of your personal data for a specific purpose is based on your consent, you can withdraw it at any time; however, until the time of your revocation, the data processing remains lawful.
Right to object to processing	If the data processing is carried out on the basis of Art. 6 (1) (e) or (f) GDPR or Art. 31 (2) (b) FADP, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. The respective legal basis on which processing is based can be found in the information under "Purpose of processing and legal basis". If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims pursuant to Art. 21 (1) GDPR / Art. 30 (2) FADP. If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising. If you object, your personal data will no longer be used for direct marketing purposes.	If the data processing is carried out on the basis of Art. 6 (1) (e) or (f) GDPR or Art. 31 (2) (b) FADP, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. The respective legal basis on which processing is based can be found in the information under "Purpose of processing and legal basis". If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims pursuant to Art. 21 (1) GDPR / Art. 30 (2) FADP. If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising. If you object, your personal data will no longer be used for direct marketing purposes.
Right to data portability	You have the right to have your data provided to the controller transferred to a third party.	-
Right to lodge a complaint in accordance with Art. 77 GDPR	You have the right to lodge a complaint with a supervisory authority if you believe that the processing of data concerning you is unlawful. The Bavarian State Office for Data Protection Supervision (https://www.lda.bayern.de) is responsible for us	You have the right to lodge a complaint with a supervisory authority if you believe that the processing of data concerning you is unlawful. The Bavarian State Office for Data Protection Supervision (https://www.lda.bayern.de) is responsible for us
Application to the Federal Data Protection and	The Federal Data Protection and Information Commissioner (FDPIC) is an advisor and	The Federal Data Protection and Information Commissioner (FDPIC) is an advisor and

Information Commissioner on the exercise of your rights as a data subject (Art. 58 (d) FADP)	supervisor on data protection issues. At their request, it advises the data subjects on the exercise of their rights as data subjects (Art. 58 para. d FADP): Federal Data Protection and Information CommissionerFeldeggweg 1CH-3003 BernWebsite: https://www.edoeb.admin.ch	supervisor on data protection issues. At their request, it advises the data subjects on the exercise of their rights as data subjects (Art. 58 para. d FADP): Federal Data Protection and Information CommissionerFeldeggweg 1CH-3003 BernWebsite: https://www.edoeb.admin.ch
Data sources		Data sources ▪ Affiliates ▪ Tipster
Automated decision-making including profiling	Profiling is not used at Rotax Bike Technology AG.	Profiling is not used at Rotax Bike Technology AG.

Note: For reasons of improved readability, the masculine spelling was usually used. At this point, we expressly point out that both the masculine, feminine and diverse spelling are meant.

Last update: 01.11.2026