E-BIKE SYSTEM
INTEGRATION

Duty to provide information pursuant to Art. 12 et seq. EU General Data Protection Regulation of Rotax Bike Technology Europe GmbH

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:

Description	**in accordance with Art. 13 EU GDPR (direct survey)**	**according to Article 14 EU GDPR (Third-party survey)**
Names and contact details of the controller, the controller's representative and any data protection officer	Person in charge: 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 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 processing and legal basis	The data is collected for the purpose of ▪ Sales and order processing on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Spare parts storage and deliveries in customer service on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Customer service for merchants on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Finance and controlling on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Credit assessment on the legal basis of Art. 6 (1) sentence 1 f GDPR for economic interest to minimise risk ▪ Mobile FIT app on the legal basis of Art. 6 (1) sentence 1 b GDPR and Art 6 (1) sentence 1 a GDPR ▪ Maintenance tool on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ QA-Cloud on the legal basis of Art. 6 (1) sentence 1 b GDPR due to warrantyclaims, Art. 6 (1) sentence 1 c GDPR due to warrantyclaims, Art. 6 (1) sentence 1 f GDPR for reasons of benchmarking and quality assurance ▪ PM tool on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Collection and transmission of telemetry data on the legal basis of Art. 6 (1) f GDPR for economic interest for further development and guarantee assurance ▪ Purchasing on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ IT and communication technology Operation and support on the legal basis of Art. 6 (1) sentence 1 b GDPR, Art. 6 (1) sentence 1 f GDPR for the optimisation and safeguarding of process flows	The data is collected for the purpose of ▪ Sales and order processing on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Spare parts storage and deliveries in customer service on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Customer service for merchants on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Finance and controlling on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Credit assessment on the legal basis of Art. 6 (1) sentence 1 f GDPR for economic interest to minimise risk ▪ Mobile FIT app on the legal basis of Art. 6 (1) sentence 1 b GDPR and Art 6 (1) sentence 1 a GDPR ▪ Maintenance tool on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ QA-Cloud on the legal basis of Art. 6 (1) sentence 1 b GDPR due to warrantyclaims, Art. 6 (1) sentence 1 c GDPR due to warrantyclaims, Art. 6 (1) sentence 1 f GDPR for reasons of benchmarking and quality assurance ▪ PM tool on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Collection and transmission of telemetry data on the legal basis of Art. 6 (1) f GDPR for economic interest for further development and guarantee assurance ▪ Purchasing on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ IT and communication technology Operation and support on the legal basis of Art. 6 (1) sentence 1 b GDPR, Art. 6 (1) sentence 1 f GDPR for the optimisation and safeguarding of process flows

	▪ Recruitment of new employees and interns on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Establishment, implementation and termination of an employment relationship on the legal basis of Art. 6 (1) sentence 1 b GDPR	▪ Recruitment of new employees and interns on the legal basis of Art. 6 (1) sentence 1 b GDPR ▪ Establishment, implementation and termination of an employment relationship on the legal basis of Art. 6 (1) sentence 1 b GDPR
Category of data (depending on processing status and contact type)	-	In the context of sales and order processing: Master and contact data, quantity, article, conditions, optional end customer name/commission (for dealer orders) As part of spare parts storage and deliveries in customer service: Master and contact data, quantity, article, optional end customer name, freight instructions (delivery times, etc.) As part of the customer service for dealers: Master and contact data, frame number/serial numbers, sales receipt of the dealer, error description, shipping data In the context of finance and controlling: Master contact data, booking data, bank data, ERP data, contract data, tax documents, salary data As part of the credit check: Reference data As part of the Mobile FIT app: Mandatory fields: first name, last name, e-mail address, password User account optional: address, country, height, weight, gender, date of birth, picture/avatar; Vehicle data: frame number/s, key from QR code (ownership), settings; Navigation/Location: Location Data / GPS; Accounts: Komoot account, Strava As part of the Maintenance Tool: 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 As part of the QA-Cloud: 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 As part of the PM tool: 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 Establishment, implementation and termination of an employment relationship: Master data, communication data, dates of birth, salary information, bonus figures, bank data, management levels, employment contracts, if applicable, application documents, social security data, tax data, family data (if necessary, e.g. Child allowances), maternity leave, vacation periods, sick leave / sick days, job description, consents, work instructions incl. AAB and LAB, emergency contact (with master and contact persons and relationship to the employee), personnel number, time of entry, IT accounts
Category of recipients of data	In the context of sales and order processing: Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and accounting) As part of spare parts storage and deliveries in customer service: Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and logistics), transport companies, parcel services, customs As part of the customer service for dealers:	In the context of sales and order processing: Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and accounting) As part of spare parts storage and deliveries in customer service: Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and logistics), transport companies, parcel services, customs As part of the customer service for dealers:

	Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and logistics), transport companies, parcel services, customs In the context of finance and controlling: Processors (IT service providers, e-mail service providers, ERP providers, cloud telephone systems, financial service providers), banks, tax authorities, authorities (Federal Statistical Office, state statistical offices, customs, etc.), insurance companies As part of the credit check: Processor (IT service provider, e-mail service provider, ERP provider, cloud telephone system, financial service provider), Creditreform As part of the Mobile FIT app: Processor (IT service provider, cloud service provider), Google (Auth, track sharing), Facebook (Auth, track sharing), Komoot App (connection to tracking), Openstreetmap, Strava App As part of the Maintenance Tool: Processors (IT service providers, cloud hosters, development service providers) As part of the QA-Cloud: Processors (IT service providers, cloud hosters, development service providers) As part of the PM tool: Processors (IT service providers, cloud hosters, development service providers), customers/OEM bike manufacturers As part of the collection and transmission of telemetry data: Processors (IT service providers, cloud hosters, development service providers), network providers, customers/OEM bike manufacturers As part of purchasing: Processors (IT service providers, 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, e-mail 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, e-mail service providers, cloud telephone systems, personnel service providers) Establishment, implementation and termination of an employment relationship: Tax authorities, social security institutions, banks, insurancebrokers, mobilityservice providers, training providers, processors (IT service providers, e-mail service providers,	Processors (IT service providers, email service providers, ERP providers, cloud telephone systems, back office and logistics), transport companies, parcel services, customs In the context of finance and controlling: Processors (IT service providers, e-mail service providers, ERP providers, cloud telephone systems, financial service providers), banks, tax authorities, authorities (Federal Statistical Office, state statistical offices, customs, etc.), insurance companies As part of the credit check: Processor (IT service provider, e-mail service provider, ERP provider, cloud telephone system, financial service provider), Creditreform As part of the Mobile FIT app: Processor (IT service provider, cloud service provider), Google (Auth, track sharing), Facebook (Auth, track sharing), Komoot App (connection to tracking), Openstreetmap, Strava App As part of the Maintenance Tool: Processors (IT service providers, cloud hosters, development service providers) As part of the QA-Cloud: Processors (IT service providers, cloud hosters, development service providers) As part of the PM tool: Processors (IT service providers, cloud hosters, development service providers), customers/OEM bike manufacturers As part of the collection and transmission of telemetry data: Processors (IT service providers, cloud hosters, development service providers), network providers, customers/OEM bike manufacturers As part of purchasing: Processors (IT service providers, 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, e-mail 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, e-mail service providers, cloud telephone systems, personnel service providers) Establishment, implementation and termination of an employment relationship: Tax authorities, social security institutions, banks, insurancebrokers, mobilityservice providers, training providers, processors (IT service providers, e-mail service providers,

	cloud telephone systems, personnel service providers), data protectionofficer	cloud telephone systems, personnel service providers), data protectionofficer
Possible recipients in a third country or an international organisation, as well as the existence or absence of an adequacy decision and the reference to the appropriate safeguards	Service provider for financial management, personnel management, marketing, purchasing, logistics and shipping, IT support and telecommunications provision, SAP support, development services: Biketec GmbH Luzernstrasse 84 4950 Huttwil Switzerland The adequacy decision pursuant to Art. 45 GDPR applies to Switzerland.	Service provider for financial management, personnel management, marketing, purchasing, logistics and shipping, IT support and telecommunications provision, SAP support, development services: Biketec GmbH Luzernstrasse 84 4950 Huttwil Switzerland The adequacy decision pursuant to Art. 45 GDPR applies to Switzerland
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. Documents under commercial law 6 years starting at the end of the financial year Service tickets 7 years starting at the end of the financial year tax documents 10 years beginning with the end of the financial year Social security-relevant documents 10 years starting at the end of the financial year The app's data remains in place until the end customer (vehicle user) deletes his account. 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.	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. Documents under commercial law 6 years starting at the end of the financial year Service tickets 7 years starting at the end of the financial year tax documents 10 years beginning with the end of the financial year Social security-relevant documents 10 years starting at the end of the financial year The app's data remains in place until the end customer (vehicle user) deletes his account. 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.
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.
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	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.	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, 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 in accordance with Art. 21 (1) GDPR. 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 then no longer be used for the purpose of direct marketing in accordance with Art. 21 (2) GDPR.	If the data processing is carried out on the basis of Art. 6 (1) (e) or (f) GDPR, 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 in accordance with Art. 21 (1) GDPR. 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 then no longer be used for the purpose of direct marketing in accordance with Art. 21 (2) GDPR.
Right to data portability	You have the right to have your data provided to the controller transferred to a third party.	-
Right of appeal	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
Data sources	-	Data sources ▪ Affiliates ▪ Tipster
Automated decision-making including profiling	Profiling is not used at Rotax Bike Technology Europe GmbH	Profiling is not used at Rotax Bike Technology Europe GmbH

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