

DATA PROTECTION INFORMATION FOR KX SERVICES for data subjects pursuant to Articles 13 and 14 GDPR

Controller pursuant to Article 24 GDPR:

Kwizda Agro GmbH („KWIZDA“)
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Represented by:

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1. DATA PROTECTION OFFICER PURSUANT TO ARTICLE 37 ET SEQ. GDPR

KWIZDA is a privately held company and not a public authority or body under Article 37(1)(a) GDPR. Our core activities do not include large-scale processing of special categories of personal data or data relating to criminal convictions and offenses, nor do we engage in large-scale regular and systematic monitoring of individuals as per Article 37(1)(b) and (c) GDPR.

Therefore, KWIZDA is not obliged to appoint a Data Protection Officer.

2. HANDLING OF PERSONAL DATA

KWIZDA takes the protection of your personal data very seriously.

Personal data refers to information that can be attributed to you individually. Examples include your address, name, postal address, email address, or telephone number. Data such as the number of users visiting a website is not personal data, as it cannot be assigned to an individual.

KWIZDA processes personal data in accordance with applicable data protection laws (especially the EU General Data Protection Regulation) and this privacy notice.

2.1 Processing of Your Data within KX Services

In the context of KX Services (KX Planner, KX Vine, KX Field, KX Rain), we process the following categories of personal data:

2.1.1 Registration Data

- Email address
- Salutation
- First name, Last name
- Postal code, City
- Country
- Company name (optional)
- Street name and number

2.1.2 Business and Field-Specific Data

- Spray plan title
- Type of cultivation (organic/conventional)
- Crop and variety
- Field location

- Field size
- Row spacing
- Application data (application date, BBCH stage, canopy height, etc.)
- Product data (name, category, unit)
- Stock and demand for application products

2.1.3 Technical Data

- Browser type and version
- Operating system used
- Referrer URL
- IP address
- Access time
- Data volume transferred
- Other technical parameters

2.2 Cookies and Similar Technologies

Our websites use cookies.

By clicking “Allow all cookies,” you accept all types of cookies. Alternatively, click “Allow only necessary cookies” to allow only those essential for website operation.

Necessary Cookies

Technically necessary cookies ensure the functionality and usability of the website. These are used based on our legitimate interest to provide a technically flawless website. You may disable cookie usage in your browser settings.

Statistics Cookies

These cookies collect information on how websites are used to improve attractiveness, content, and functionality. These cookies are used only with your consent.

Marketing Cookies

Marketing cookies are provided by third-party advertising companies and collect information about your visited websites. These cookies are used only with your consent.

2.3 Purposes of Data Processing

We process your personal data for the following purposes:

- a) Provision of KX Services
- b) Creation and management of spray plans
- c) Provision of weather forecasts and disease pressure forecasts
- d) Advisory services by Kwizda field representatives
- e) Service improvement and product development
- f) Marketing purposes (with consent)
- g) Data reconciliation to ensure data accuracy:

To complete incomplete registration data, we use:

- Existing customer master data from our internal ERP system
- Publicly available company data (e.g. from the Ministry of Public Finance) to ensure correct company names and legal forms

Legal basis: Art. 6(1)(f) GDPR (legitimate interests)

Legitimate interest: Data accuracy and proper business operations

2.4 Recipients of the Data

Your data is processed by:

- a) KWIZDA employees as required
- b) KWIZDA field representatives for advisory purposes
- c) KWIZDA HOLDING GMBH

2.5 Technical and Organizational Measures

We use SSL (Secure Socket Layer) encryption for website visits, applying the highest encryption level supported by your browser, typically 256-bit encryption. If unsupported, 128-bit v3 encryption is used. You can recognize an encrypted connection by the closed lock symbol in your browser's address bar.

We also implement technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorized access. Our security measures are continuously improved.

Implemented security measures include:

1. **Encryption:**
 - Transport encryption (TLS version, cipher)
 - Data storage encryption
2. **Access Control:**
 - Authentication methods
 - Authorization concept

3. RIGHTS OF DATA SUBJECTS

You have the right to:

- a) Request information about your personal data processed by us (Art. 15 GDPR)
- b) Request correction of incorrect or incomplete personal data (Art. 16 GDPR)
- c) Request deletion of your personal data (Art. 17 GDPR), unless required for freedom of expression, compliance with a legal obligation, public interest, or legal claims
- d) Request restriction of processing (Art. 18 GDPR)
- e) Receive your personal data in a structured, commonly used, machine-readable format (Art. 20 GDPR)
- f) Withdraw consent at any time (Art. 7(3) GDPR)
- g) Lodge a complaint with a supervisory authority (Art. 77 GDPR)

3.1 Exercising Data Subject Rights

To exercise any of your rights, please contact us via email at **DatenschutzAgro@kwizda-agro.at**.

For identification purposes, please submit a copy of an official photo ID and specify your relationship with us (e.g., employee, applicant, supplier, customer) and relevant period.

3.2 Right to Object

If your personal data is processed based on legitimate interests (Art. 6(1)(f) GDPR), you have the right to object to such processing on grounds related to your situation or if you object to direct marketing.

To exercise your right of objection or withdrawal, simply send an email to **DatenschutzAgro@kwizda-agro.at**.

4. DATA RETENTION PERIODS

Personal data is deleted when processing purposes cease unless legal retention periods apply.

Data will be stored until:

- End of the business relationship or expiration of warranty/limitation periods
- End of legal disputes where data is needed as evidence
- Three years after last contact with a business partner

Additionally:

- **Plant protection law (§ 11(3) PSMG):** 5 years
- **Fertilizer regulation (§ 2(6) Düngemittelverordnung):** 2 years
- **Tax retention (BAO §§ 207(2), 209):** 10 years
- **Contractual claims (ABGB):** 3 to 30 years depending on type
- **Employment (e.g., certificates, claims):** up to 30 years

KX Services-specific:

- Registration data stored during service usage
- Data deleted one year after account deactivation
- Spray plans and related data are anonymized
- Technical log data anonymized for service improvement

5. UPDATES AND CHANGES TO THIS PRIVACY POLICY

Due to the continuous development of our website and legal requirements, this privacy policy may be updated.

The current version is always available at: <https://www.kx-digital.com/policy>

Effective: February 2025

Kwizda Agro GmbH

DatenschutzAgro@kwizda-agro.at