

General Privacy Notice of Union GmbH

(as of September 2026)

In this Data Protection Notice, Union GmbH (hereinafter "UNION") explains how personal data is collected, used or otherwise processed. The instructions are divided into the following sections: The relevant section for your situation is:

I. Privacy Notice for Website II. Data protection information for Energy Partner III. Data protection information for customers.

I. PRIVACY NOTICE FOR THE WEBSITE

1. Controller

Responsible person in the sense of the art. 4 No. 7 GDPR is:

Union GmbH

Pelzacker 23

79194 Gundelfingen

Germany

E-mail: privacy@unionenergie.de

Questions about data protection can be directed to privacy@unionenergie.de.

Who is responsible for collecting data on this website?

The data processing on this website is carried out by the website operator. You can find his contact details in the section "Note to the responsible body" in this data protection declaration.

How do we collect your data?

Your data is collected on the one hand by you informing us of this. This can be, for example, data that you enter into a contact form.

Other data is collected automatically or after your consent when visiting the website by our IT systems. These are mainly technical data (e.g. Internet browser, operating system or time of page call). The collection of this data takes place automatically as soon as you enter this website.

What do we use your data for?

Part of the data is collected in order to ensure error-free provision of the website. Other data may be used to analyze your user behavior. If contracts can be concluded or initiated via the website, the transmitted data will also be processed for contract offers, orders or other order requests.

What rights do you have regarding your data?

You have the right at any time to receive information free of charge about the origin, recipient and purpose of your stored personal data. You also have a right to request the correction or deletion of this data. If you have given consent for data processing, you can revoke this consent at any time for the future. You also have the right to request, in certain circumstances, the restriction of the processing of your personal data. Furthermore, you have the right to lodge a complaint with the competent supervisory authority.

You can contact us at any time for this and other questions regarding data protection.

Analysis tools and third-party tools

When visiting this website, your surfing behavior can be statistically evaluated. This is done mainly with so-called analysis programs.

Detailed information about these analysis programs can be found in the following data protection declaration.

2. Hosting

We host the contents of our website at the following provider:



All-Inkl

The provider is ALL-INKL.COM – Neue Medien Münnich, Inh. René Münnich, Hauptstraße 68, 02742 Friedersdorf (hereinafter All-Inkl). Details can be found in the data protection declaration of All-Inkl: <https://all-inkl.com/datenschutzinformationen/>.

The use of All-Inkl is based on art. 6 par. 1 lit. f GDPR. We have a legitimate interest in the most reliable possible presentation of our website. If a corresponding consent has been requested, the processing takes place exclusively on the basis of art. 6 par. 1 lit. a GDPR and § 25 para. 1 TDDDG, insofar as the consent includes the storage of cookies or access to information in the user's terminal (e.g. device fingerprinting) in the sense of the TDDDG. The consent is revocable at any time.

Order processing:

We have concluded a contract for order processing (AVV) for the use of the above mentioned service. This is a data protection contract that ensures that it processes the personal data of our website visitors only according to our instructions and in compliance with the GDPR.

3. General notices and mandatory information

Data protection:

The operators of these sites take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this data protection declaration.

When you use this website, various personal data are collected. Personal data is data with which you can be personally identified. This data protection declaration explains which data we collect and what we use it for. It also explains how and for what purpose this is done.

We point out that data transmission on the Internet (e.g. during communication by e-mail) may have security gaps. A seamless protection of the data from access by third parties is not possible.

Storage time:

If no more specific storage period has been mentioned within this data protection declaration, your personal data will remain with us until the purpose for data processing ceases. If you make a legitimate deletion request or withdraw consent to data processing, your data will be deleted unless we have other legally permitted reasons for storing your personal data (e.g. tax or commercial retention periods); in the latter case, the deletion shall take place after these reasons have been omitted.

General information on the legal basis of data processing on this website

If you have consented to the data processing, we process your personal data on the basis of art. 6 par. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR, if special data categories by type. 9 par. 1 GDPR are processed. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also carried out on the basis of art. 49 para 1 lit. a GDPR. If you have consented to the storage of cookies or to the access to information in your device (e.g. via device fingerprinting), the data processing is additionally based on § 25 para. 1 TDDDG. The consent is revocable at any time. If your data is necessary for the fulfilment of the contract or for the implementation of pre-contractual measures, we process your data on the basis of the type. 6 par. 1 lit. b GDPR. Furthermore, we process your data, if it is necessary to fulfill a legal obligation, on the basis of art. 6 par. 1 lit. c GDPR. The data processing can also be based on our legitimate interest according to art. 6 par. 1 lit. f GDPR. The relevant legal bases in each individual case are informed in the following paragraphs of this data protection declaration.

Recipients of personal data:

As part of our business activities, we work together with various external bodies. In some cases, a transfer of personal data to these external bodies is also necessary. We only pass on personal data to external bodies if this is necessary in the context of a performance of the contract, if we are legally obliged to do so (e.g. transfer of data to tax authorities), if we have a



legitimate interest by nature. 6 par. 1 lit. f GDPR at the transfer or if another legal basis allows the data transfer. When using processors, we only share personal data of our customers on the basis of a valid contract for order processing. In the case of joint processing, a joint processing contract shall be concluded.

Withdrawal of your consent to data processing:

Many data processing operations are only possible with your express consent. You can revoke an already given consent at any time. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

Right of objection against data collection in special cases and against direct marketing (Art. 21 GDPR)

if the data processing on the basis of art. 6 par. 1 lit. e or f GDPR, you have at any time the right to object to the processing of your personal data for reasons arising from your particular situation; This also applies to profiling based on these provisions.

The respective legal basis on which processing is based can be found in this data protection declaration.

If you object, we will no longer process your personal data concerned, unless we can prove compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for asserting, exercising or defending legal claims (contradiction by nature). 21 para 1 GDPR.

If your personal data are processed for direct advertising, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising;

This also applies to profiling insofar as it is related to such direct advertising. If you object, your personal data will subsequently no longer be used for the purpose of direct advertising (contradiction by nature). 21 para 2 GDPR.

Right of complaint to the competent supervisory authority:

In the event of breaches of the GDPR, the persons concerned have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged breach. The right of appeal shall be without prejudice to other administrative or judicial remedies.

Right to data portability:

You have the right to have data that we process automatically on the basis of your consent or in the performance of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only take place as far as it is technically feasible.

Information, correction and deletion:

Within the framework of the applicable legal provisions, you have the right to free information about your stored personal data, its origin and recipient and the purpose of the data processing and, if applicable, a right to rectification or deletion of this data at any time. You can contact us at any time for this and other questions regarding personal data.

Right to restriction of processing:

You have the right to request the restriction of the processing of your personal data. For this you can contact us at any time. The right to restrict processing exists in the following cases:

- If you dispute the accuracy of your personal data stored with us, we usually need time to verify this. For the duration of the examination, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data has been/happens unlawfully, you can request the restriction of data processing instead of deletion.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request the restriction of the processing of your personal data instead of deletion.



- If you submit an objection pursuant to Art. 21 para. 1 GDPR, a balance must be made between your and our interests. As long as it is not yet clear whose interests prevail, you have the right to demand the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data, apart from their storage, may only be processed with your consent or in order to assert, exercise or defend legal claims or to protect the rights of another natural or legal person or for reasons of an important public interest of the European Union or a Member State.

SSL or TLS encryption:

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or requests that you send to us as a site operator. An encrypted connection can be recognized by the fact that the address line of the browser changes from “http://” to “https://” and at the lock icon in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

Objection to advertising e-mails:

The use of contact data published as part of the imprint obligation for sending unsolicited advertising and information materials is hereby objected to. The operators of the sites expressly reserve the right to take legal action in the event of unsolicited sending of advertising information, for example by spam e-mails.

4. Data collection on this website

Cookies:

Our websites use so-called “cookies”. Cookies are small data packages and do no damage to your device. They are stored either temporarily for the duration of a session (session cookies) or permanently (permanent cookies) on your device. Session cookies are automatically deleted after the end of your visit. Permanent cookies remain stored on your device until you delete them yourself or an automatic deletion by your web browser takes place.

Cookies can come from us (first-party cookies) or from third-party companies (so-called third-party cookies). Third-party cookies enable the integration of certain third-party services within websites (e.g. cookies for processing payment services).

Cookies have different functions. Numerous cookies are technically necessary because certain website functions would not work without them (e.g. the shopping cart function or the display of videos). Other cookies can be used to evaluate user behavior or for advertising purposes.

Cookies that are necessary to carry out the electronic communication process, to provide certain functions desired by you (e.g. for the shopping cart function) or to optimize the website (e.g. cookies to measure the web audience) (necessary cookies) are made on the basis of art. 6 par. 1 lit. f GDPR, unless another legal basis is specified. The website operator has a legitimate interest in the storage of necessary cookies for the technically error-free and optimized provision of its services. If consent to the storage of cookies and comparable recognition technologies has been requested, the processing takes place exclusively on the basis of this consent (Art. 6 para 1 lit. a GDPR and § 25 para 1 TDDDG); the consent can be revoked at any time.

You can set your browser so that you are informed about the setting of cookies and allow cookies only in individual cases, exclude the acceptance of cookies for certain cases or generally, and activate the automatic deletion of cookies when closing the browser. When deactivating cookies, the functionality of this website may be limited.

If further cookies and services are used on this website, you can find this in this data protection declaration.

Consent to Borlabs Cookie:

Our website uses the consent technology of Borlabs Cookie to obtain your consent to store certain cookies in your browser or to use certain technologies and to document them in compliance with data protection. The provider of



this technology is Borlabs GmbH, Hamburger Str. 11, 22083 Hamburg (hereinafter Borlabs).

When you enter our website, a Borlabs cookie is stored in your browser, in which the consents you have given or the withdrawal of these consents are stored. This data is not passed on to the provider of Borlabs Cookie.

The collected data will be stored until you request us to delete or delete it. delete the Borlabs cookie itself or the purpose for data storage is eliminated. Mandatory statutory retention periods remain unaffected. Details about the data processing of Borlab's cookie can be found under <https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/>.

The use of Borlabs cookie consent technology is done in order to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6 par. 1 lit. c GDPR.

Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- Browser type and browser version
- Operating system used
- Referrer URL
- Hostname of the accessing computer
- Time of the server request
- IP address

A merger of these data with other data sources is not carried out.

These data are collected on the basis of art. 6 par. 1 lit. f GDPR. The website operator has a legitimate interest in the technically error-free presentation and optimization of his website – for this purpose, the server log files must be recorded.

Contact form:

If you send us inquiries via contact form, your information from the inquiry form, including the contact data you provide there, will be stored

with us for the purpose of processing the inquiry and in the case of follow-up inquiries. We do not pass on this data without your consent.

The processing of this data takes place on the basis of art. 6 par. 1 lit. b GDPR, if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 para 1 lit. f GDPR) or on your consent (Art. 6 para 1 lit. a GDPR) if requested; the consent is revocable at any time.

The data entered by you in the contact form will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage ceases (e.g. after the processing of your request has been completed). Mandatory legal provisions – in particular retention periods – remain unaffected.

Request by e-mail, telephone or fax:

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request), will be stored and processed by us for the purpose of processing your request. We do not pass on this data without your consent.

The processing of this data takes place on the basis of art. 6 par. 1 lit. b GDPR, if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 para 1 lit. f GDPR) or on your consent (Art. 6 para 1 lit. a GDPR) if requested; the consent is revocable at any time.

The data you send to us via contact requests will remain with us until you ask us to delete it, revoke your consent for storage or the purpose for data storage ceases (e.g. after processing your request has been completed). Mandatory statutory provisions – in particular statutory retention periods – remain unaffected.



5. Analysis tools and advertising

Google Analytics:

This website uses functions of the web analysis service Google Analytics. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics allows the website operator to analyze the behavior of website visitors. The website operator receives various usage data, such as page views, dwell time, operating systems used and origin of the user. These data are assigned to the respective end device of the user. An assignment to a user ID does not take place.

Furthermore, with Google Analytics, we can record your mouse and scroll movements and clicks. In addition, Google Analytics uses various modelling approaches to complement the collected data sets and uses machine learning technologies in data analysis.

Google Analytics uses technologies that enable user recognition for the purpose of analyzing user behavior (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is usually transferred to a server of Google in the USA and stored there.

The use of this service is based on your consent according to art. 6 par. 1 lit. a GDPR and § 25 para. 1 TDDDG. The consent is revocable at any time.

Data transmission to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://business.safety.google/adscontrollerterms/sccs/>.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the USA, which aims to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information can be obtained from the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

IP anonymization:

Google Analytics IP anonymization is activated. This will shorten your Google IP address within member states of the European Union or in other contracting states of the Agreement on the European Economic Area before transfer to the USA. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities and to provide other services related to website use and Internet use to the website operator. The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google.

Browser plugin:

You can prevent the collection and processing of your data by Google by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>.

More information on the handling of user data at Google Analytics can be found in Google's privacy policy:

<https://support.google.com/analytics/answer/6004245?hl=de>.

Order processing:

We have concluded a contract with Google for order processing and fully implement the strict requirements of the German data protection authorities when using Google Analytics.

Trustindex.io (Google and Trustpilot reviews):

On our website, we use the Trustindex.io plugin to display customer reviews of our Google company profile and Trustpilot.

The rating widgets are loaded only after you have given your consent via our consent management tool (Borlabs cookie). Without your consent, no connections to the service's servers will be established.



After your consent, your browser can connect to Trustindex.io servers and, depending on the rating service displayed, to Google or Trustpilot. In particular, the following data can be processed:

- IP address
- Date and time of page view
- Browser and device information
- Referrer URL
- technically necessary

Connection data:

The processing takes place exclusively on the basis of your consent in accordance with art. 6 par. 1 lit. a GDPR and § 25 para. 1 TDDDG. You can revoke your consent at any time with effect for the future via the settings of our consent management tool.

Further information can be found in the data protection declarations of the respective providers:

Trustindex.io: <https://www.trustindex.io/privacy-policy/>

Google: <https://policies.google.com/privacy>

Trustpilot: <https://de.legal.trustpilot.com/for-reviewers/end-user-privacy-terms>

6. Newsletter

Newsletter data:

If you would like to obtain the newsletter offered on the website, we need an e-mail address from you as well as information that allows us to verify that you are the owner of the specified e-mail address and agree to receive the newsletter. Further data is not or only collected on a voluntary basis. For the processing of the newsletters, we use newsletter service providers, which are described below.

Brevo:

This website uses Brevo for sending newsletters. The provider is Sendinblue GmbH, Köpenicker Straße 126, 10179 Berlin, Germany.

Brevo is a service with which, among other things, the sending of newsletters can be organized and analyzed. The data entered by you for the purpose of newsletter reference is stored on the servers of Sendinblue GmbH in Germany.

Data analysis by Brevo:

With the help of Brevo, we are able to analyze our newsletter campaigns. For example, we can see whether a newsletter message has been opened and which links have been clicked. In this way, we can determine, among other things, which links were clicked particularly often.

In addition, we can see if certain previously defined actions were performed after opening/clicking (conversion rate). For example, we can recognize whether you made a purchase after clicking on the newsletter.

Brevo also allows us to subdivide ("cluster") the newsletter recipients according to different categories. The newsletter recipients can be divided, for example, by age, gender or place of residence. In this way, the newsletters can be better adapted to the respective target groups.

Detailed information on the functions of Brevo The following link:
<https://www.brevo.com/de/newsletter-software/>.

Legal basis:

The data processing takes place on the basis of your consent (Art. 6 para 1 lit. a GDPR). You can revoke this consent at any time. The legality of the data processing operations already carried out remains unaffected by the revocation.

Newsletter within the framework of an existing customer relationship.

If you register as a user of the back office or as a customer or energy partner and deposit your e-mail address, this can subsequently be used by us for sending an e-mail newsletter, if you have not objected to such use. In such a case, the e-mail newsletter will only send direct advertising for own similar goods or services. You can object to the use of your e-mail address at any time, without incurring any costs other than the transmission costs according to the basic tariffs, by using the unsubscribe link contained in



each newsletter or by contacting us under the contact details mentioned above.

The legal basis for sending the newsletter as a result of the sale of goods or services is our legitimate interest in accordance with art. 6 para 1 lit. f) GDPR for the implementation of direct marketing measures.

We point out that, if your data has already been used for the sending of e-mail advertising in the case of an existing customer relationship, in the event of an objection against further advertising use, we will provide the data for the existence of the requirements of § 7 para. 3 UWG until the expiry of the statutory limitation period (according to § 195 BGB three calendar years after the sending of the last advertising e-mail) in order to be able to legally defend us. The accountability and proof obligation takes precedence here for this period of the deletion obligation (Art. 17 para 3 lit. e) GDPR. The legal basis for this retention of the data for consent is Art. 6 para 1 lit. c) iVm. Art. 5 para 1 lit. a, para 2, Art. 7 para 1 GDPR and Art. 6 para 1 lit. f GDPR.

Storage time:

The data you deposit with us for the purpose of the newsletter reference will be stored by us until your publication from the newsletter with us or the newsletter service provider and deleted from the newsletter distribution list after the newsletter has been unsubscribed. Data that has been stored with us for other purposes remains unaffected.

After your submission from the newsletter distribution list, your e-mail address will be sent to us or the newsletter service provider. stored in a blacklist, if this is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and is not merged with other data. This serves both your interest and our interest in compliance with the legal requirements when sending newsletters (legitimate interest in the sense of the art). 6 par. 1 lit. f GDPR. The storage in the blacklist is not limited in time. You can object to storage if your interests outweigh our legitimate interest.

For more details, see Brevo's data protection regulations under:

<https://www.brevo.com/de/datenschutz-uebersicht/> and <https://www.brevo.com/de/legal/privacypolicy/>.

Order processing:

We have concluded a contract for order processing (AVV) for the use of the above mentioned service. This is a data protection contract that ensures that it processes the personal data of our website visitors only according to our instructions and in compliance with the GDPR.

7. Plugins and Tools

YouTube with extended data protection

This website integrates videos from the YouTube website. The website is operated by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of these sites where YouTube is integrated, you connect to YouTube's servers. The YouTube server is informed which of our pages you have visited. When you are logged into your YouTube account, you allow YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

We use YouTube in extended data protection mode. Videos that are played in extended privacy mode are not used to personalize surfing on YouTube, according to YouTube. Ads that are displayed in extended data protection mode are also not personalized. In the extended data protection mode, no cookies are set. Instead, however, so-called local storage elements are stored in the browser of the user, which contain personal data similar to cookies and can be used for recognition. Details about the extended data protection mode can be found here: <https://support.google.com/youtube/answer/171780>.

If necessary, after the activation of a YouTube video, further data processing operations can be triggered, over which we have no influence.

The use of YouTube takes place in the interest of an attractive presentation of our online offers. This constitutes a legitimate interest within the



meaning of art. 6 par. 1 lit. f GDPR. If a corresponding consent has been requested, the processing takes place exclusively on the basis of art. 6 par. 1 lit. a GDPR and § 25 para. 1 TDDDG, insofar as the consent includes the storage of cookies or access to information in the user's terminal (e.g. device fingerprinting) in the sense of the TDDDG. The consent is revocable at any time.

Further information about data protection at YouTube can be found in their data protection declaration under:

<https://policies.google.com/privacy?hl=de>.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the USA, which aims to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information can be obtained from the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

Google Fonts (local hosting):

This page uses so-called Google Fonts, which are provided by Google, to display fonts in a uniform manner. Google Fonts are installed locally. A connection to Google servers does not take place.

Further information about Google Fonts can be found under

<https://developers.google.com/fonts/faq> and in Google's privacy policy:

<https://policies.google.com/privacy?hl=de>.

Google Maps:

This page uses the map service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. With the help of this service, we can integrate map material on our website.

To use the functions of Google Maps, it is necessary to store your IP address. This information is usually transferred to a Google server in the USA and stored there. The provider

of this site has no influence on this data transmission. If Google Maps is enabled, Google may use Google Fonts for the purpose of consistent display of fonts. When you call up Google Maps, your browser loads the required web fonts into its browser cache to display text and fonts correctly.

The use of Google Maps takes place in the interest of an appealing presentation of our online offers and an easy findability of the places indicated by us on the website. This constitutes a legitimate interest within the meaning of art. 6 par. 1 lit. f GDPR. If a corresponding consent has been requested, the processing takes place exclusively on the basis of art. 6 par. 1 lit. a GDPR and § 25 para. 1 TDDDG, insofar as the consent includes the storage of cookies or access to information in the user's terminal (e.g. device fingerprinting) in the sense of the TDDDG. The consent is revocable at any time.

Data transmission to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here:

<https://privacy.google.com/businesses/gdprcontrollerterms/> and

<https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

More information on the handling of user data can be found in the privacy policy of Google: <https://policies.google.com/privacy?hl=de>.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the USA, which aims to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information can be obtained from the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

Accessibility with the plugin "Ally – Web Accessibility":

To improve accessibility on our website, we use the plugin "Ally – Web Accessibility". It provides features such as contrast switching, font size



adjustment and keyboard navigation to help people with limitations make better use of it.

The plugin stores settings locally in the user's browser via the following web storage technologies:

ea11y-global-state (LocalStorage): stores permanently selected accessibility settings (e.g. contrast, larger font).

ea11y-session-state (SessionStorage): saves settings for the current session.

In addition, when the page is loaded, a connection to the API of Ally or Elementor to load configuration data of the widget. The IP address can be transmitted to the provider, also in third countries.

The processing takes place on the basis of our legitimate interest (Art. 6 para 1 lit. f GDPR) in an accessible and equal accessibility of our content. The stored data are technically necessary and serve exclusively to improve the usability.

8. Own services

Handling of applicant data:

We offer you the opportunity to apply to us (e.g. by e-mail, by post or via online applicant form). In the following, we inform you about the scope, purpose and use of your personal data collected as part of the application process. We assure that the collection, processing and use of your data is in accordance with applicable data protection law and all other legal provisions and that your data will be treated strictly confidentially.

Scope and purpose of data collection:

If you send us an application, we process your associated personal data (e.g. contact and communication data, application documents, notes in the context of interviews, etc.) insofar as this is necessary to decide on the establishment of an employment relationship. The legal basis for this is § 26 BDSG under German law (initiation of an employment relationship), Art. 6 para. 1 lit. b GDPR (general contract initiation) and – if you have given consent – Art. 6 para. 1 lit. a GDPR. The consent is revocable at any time. Your personal data will only be shared within our

company with persons involved in the processing of your application.

If the application is successful, the data submitted by you will be based on § 26 BDSG and Art. 6 para. 1 lit. b GDPR for the purpose of carrying out the employment relationship stored in our data processing systems.

As part of the application process, we may also conduct an Internet search of your person. This mainly includes Google Search, LinkedIn and Xing. The legal basis for this type of processing is our legitimate interest and an overall impression of publicly available information according to art. 6 para. 1 lit. f GDPR about you.

Duration of storage of data:

If we cannot make you a job offer, you reject a job offer or withdraw your application, we reserve the right to keep the data transmitted by you on the basis of our legitimate interests (Art. 6 para 1 lit. f GDPR) with us for up to 6 months from the end of the application process (rejection or withdrawal of the application). The data is then deleted and the physical application documents are destroyed. The storage serves in particular purposes of proof in the event of a legal dispute. If it is apparent that the data will be necessary after the expiry of the 6-month period (e.g. due to an imminent or pending legal dispute), deletion will only take place if the purpose for further storage ceases.

A longer storage can also take place if you have given a corresponding consent (Art. 6 para 1 lit. a GDPR) or if statutory storage obligations prevent deletion.

Admission to the applicant pool:

If we do not provide you with a job offer, it may be possible to include you in our applicant pool. In case of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in case of suitable vacancies.

Admission to the applicant pool takes place exclusively on the basis of your express consent (Art. 6 para 1 lit. a GDPR). The consent is voluntary and is not related to the ongoing application process. The person concerned can



revoke his consent at any time. In this case, the data from the applicant pool will be irrevocably deleted, unless there are any legal reasons for retention.

The data from the applicant pool will be irrevocably deleted at the latest two years after granting the consent.

9. Use of the back office

Creation and use of a user account:

Via the login area of our website, both energy partners and customers can set up a user account (access to the “back office”) or have us set up it. For this purpose, we process the account and contact data provided by you (in particular first and last name, address, e-mail address, etc.), your access and authentication data as well as the technical usage, protocol and access data incurred during use. Depending on the role, we also process contract-, status- and billing-related data.

The legal basis for the establishment, provision and administration of the user account is the performance of the contract or the implementation of pre-contractual measures (Art. 6 para 1 lit. b GDPR). For the security and stability of the back office, we rely on our legitimate interest (Art. 6 para 1 lit. f GDPR).

Visibility of data within the distribution network (upline/downline):

The back office represents the sales structure. Energy partners can therefore view certain data of their downstream energy partners (downline) and are themselves visible to a certain extent to the energy partners (upline) that are higher to them. The purpose, scope and legal basis of this visibility – including the provision of data to sponsor/upline energy partners as well as the presentation of rank and performance data (“Recognition”/“Top Performer”) – are described in more detail in the data protection notice for energy partners (Part II, in particular Section 3.3).

For customers, the login area is limited to the management of their own account as well as their own contract and consumption data. Visibility towards other users exists only towards the energy partner who has communicated it.

This can recognize via the back office that your contract is assigned to him, and see the data required for this and for the commission billing (in particular name and contract status). Details, including the existing joint responsibility (Art. 26 GDPR) result from the data protection notice for customers (Part III, in particular paragraphs 4 and 5).

DATA PROTECTION INSTRUCTIONS FOR ENERGY PARTNERS

With this information, UNION informs you as an energy partner about how we process your personal data in connection with the initiation, justification and implementation of your energy partner contract. For the processing of personal data of the customers you recruit, separate data protection notices apply to customers as well as – with regard to joint processing via the back office or other UNION systems – the agreement on joint responsibility (according to the annex to the Energy Partner Agreement).

1. Controller

Responsible person in the sense of the art. 4 No. 7 GDPR is:

Union GmbH

Pelzacker, 23

79194 Gundelfingen

Germany

Email: privacy@unionenergie.de

Questions about data protection can be directed to privacy@unionenergie.de.

As far as your activity concerns the joint processing of data of the brokered transactions via UNION systems, UNION and you as an energy partner are joint controllers in the sense of the art. 26 GDPR. The main contents of this agreement result from the corresponding annex to the Energy Partner Agreement.

2. Categories of personal data

Depending on the scope of your activity, we process in particular the following categories of personal data:



2.1 When registering and onboarding

- master and contact details: name, date of birth, address, e-mail address, telephone number;
- tax data: tax and sales tax identification number, information on the status according to § 19 UStG;
- trade law data: business registration
- Bank details: to pay commissions;
- Registration data: energy partner identification number and name and number of the sponsor energy partner.

2.2 Implementation of the contract

back office access data and identification card data;

- brokerage, status and commission data of the transactions you broker;
- training and qualification data.

2.3 Communication, Compliance and Technology

- correspondence and transaction data;
- technical usage, protocol and access data of the back office (and other UNION systems).

3. Purposes and legal bases

UNION processes your data for the following purposes

- 3.1 To fulfil our contract with you (Art. 6 para 1 lit. b GDPR)
- concluding, managing and terminating your Energy Partner Contract;
- Set up and manage your back office access;
- allocation, auditing and settlement of commissions;
- provide training and enforce contractual rights and obligations.

3.2 To fulfill legal obligations (Art. 6 para 1 lit. c GDPR)

- compliance with commercial and tax law storage and proof obligations;
- identity and status checks (including § 55 GewO, § 19 UStG);

- Responding to requests from public authorities, courts or supervisory authorities.

3.3 For the protection of legitimate interests (Art. 6 para 1 lit. f GDPR)

- management, management and security of the distribution network and UNION systems;
- provision of certain data relating to you – in particular name, energy partner identification number and performance and sales data – to your sponsor energy partner and other energy partners involved in sales (upline), as far as this is necessary for support, training, network management and calculation and audit of commissions;
- Recognition and recognition of your sales performance within the distribution network ("Recognition"), in particular the mention of name, rank or Qualification and achievements in internal communications, back office and events;
- Making rankings of particularly successful energy partners ("Top Performers") visible in the back office vis-à-vis other energy partners, for motivation, transparency and control of the sales network;

fraud and abuse prevention;

asserting, exercising and defending legal claims;

Information about own similar products and services (§ 7 para 3 UWG); You can object to this at any time.

Our legitimate interest lies in the legally secure and economic organization of our distribution system. With regard to the recognition of sales services and the visualization of rankings, our legitimate interest is also the motivation, retention and recognition of our energy partners. Where data is transferred to other energy partners, the legitimate interest is also based on their support and commission interests; the transfer is necessary for the operation of the distribution and remuneration system.



3.4 Based on your consent (Art. 6 para 1 lit. a GDPR)

If given separately, in particular for certain promotional addresses. A consent can be revoked at any time with effect for the future.

4. Consignee

Recipients of personal data may, where necessary, be affiliated companies of the UNION Group, other energy partners within the scope of the role and entitlement concept, service providers for IT, hosting, support, communication, billing and payment processing, tax consultants, legal advisers, auditors, banks, authorities, courts and other bodies, as far as a transfer is legally permissible or necessary.

A transfer to countries outside the EU/EEA is not planned. Insofar as such is nevertheless carried out, this is done exclusively under the conditions of the art. 44 ff. GDPR, in particular on the basis of an adequacy decision or suitable guarantees (e.g. standard contractual clauses).

5. Storage time

UNION stores personal data of the energy partner for the duration of the contractual relationship. After termination, the data will be deleted or anonymized as soon as they are no longer necessary for the stated purposes and there are no legal storage obligations or legitimate interests in further storage.

6. Your rights

In accordance with the legal requirements, you have the right to information (Art. 15 GDPR), correction (Art. 16 GDPR), deletion (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and data portability (Art. 20 GDPR). You can revoke a given consent at any time with effect for the future (Art. 7 para 3 GDPR). A decision based solely on automated processing, including profiling within the meaning of the art. 22 GDPR does not take place.

Right of objection (Art. 21 GDPR):

You have the right, for reasons arising from your particular situation, at any time against the processing of your data, which is referred to in

Art. 6 para. 1 lit. f GDPR is based on objection.

You can object to processing for direct marketing purposes at any time without giving reasons.

Right of complaint:

You have the right to complain to a data protection supervisory authority. Responsible for UNION is the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg (LfDI BW), Heilbronner Straße 35, 70191 Stuttgart.

7. Amendments to these Notes

UNION may adjust this privacy notice if this becomes necessary due to changed legal requirements, changed processing operations or technical or organizational changes. For the processing of your personal data, the current version of the data protection notice applies.

III. PRIVACY NOTICE FOR CUSTOMERS

This information applies to the processing of personal data if you – usually following the contact by an independent energy partner of UNION – use your data via the online forms provided by UNION. Submit terminating routes to UNION to initiate or conclude an energy supply contract (electricity/gas). As soon as your contract is assigned to a specific energy partner and managed at UNION in the back office, UNION and the respective energy partner are jointly responsible (see Section 5).

1. Controller

Responsible person in the sense of the art. 4 No. 7 GDPR is:

Union GmbH

Pelzacker 23

79194 Gundelfingen

Germany

E-mail: privacy@unionenergie.de

2. What personal data we process about you

In connection with the initiation and implementation of your energy supply contract, we process in particular:



- master and contact details: name, delivery and billing address, date of birth, e-mail address, telephone number;
- Contract and consumption data: consumption data, historical suppliers, tariff and contract data;
- credit and payment experience data: information on creditworthiness and payment behaviour, including credit references;
- Payment processing bank details (SEPA direct debit), which you specify via the secure processes provided for this purpose;
- status and billing data: start of delivery, status of revocation, change, cancellation or termination, payment and performance status;
- assignment data: identification number of the intermediary energy partner;
- Communication data: your correspondence with customer service and requests you make to an energy partner (name, email, telephone);

3. Purposes and legal bases

3.1 To fulfil our contract with you (Art. 6 para 1 lit. b GDPR)

- the initiation, conclusion and implementation of the energy supply contract;
- delivery, settlement and payment processing;
- processing of revocation, change, cancellation and termination;
- Customer service and processing of your requests.

3.2 To fulfill legal obligations (Art. 6 para 1 lit. c GDPR)

- commercial and tax law storage and proof obligations (§ 257 HGB, § 147 AO);
- If necessary, specify obligations under energy law, e.g. EnWG;
- Responding to requests from authorities and courts.

3.3 For the protection of legitimate interests (Art. 6 para 1 lit. f GDPR)

- Assignment of your contract to the intermediary energy partner and administration in the back office (including commission billing);
- fraud and abuse prevention and security of our systems;
- asserting and defending legal claims;
- Information about own similar products and services (§ 7 para 3 UWG); You can object to this at any time;
- Carrying out a credit/creditworthiness check before establishing the contractual relationship by obtaining information and score values from credit bureaus hedging the risk of default (Art. 6 para.) 1 lit. b and lit. f GDPR;[OP8.1]

3.4 Based on your consent (Art. 6 para 1 lit. a GDPR)

Advertising by e-mail, telephone or other electronic communication, insofar as consent is required for this (in particular telephone advertising, § 7 para 2 UWG). You can revoke a consent at any time with effect for the future.

An energy partner may also address you advertising if there is an effective legal basis for this – in particular your consent.

4. Recipients and international transfers

A transfer of your data will only take place if this is necessary for the fulfillment of the stated purposes or if there is a legal obligation, in particular to:

- the intermediary energy partner to whom your contract is assigned – limited to the data required for allocation and commission in the back office;
- network operators, metering point operators and other market partners where necessary for the supply of energy;
- credit institutions and payment service providers;
- IT, hosting and support service providers as processors (Art. 28 GDPR);
- tax advisors and legal advisors;
- related companies of the UNION group;



- Authorities and courts if there is a legal obligation.

A transfer to countries outside the EU/EEA is not planned. Insofar as such is nevertheless carried out, this is done exclusively under the conditions of the art. 44 ff. GDPR. specify if necessary

5. Shared responsibility with the energy partner (Art. 26 GDPR)

We collect your data directly from you by submitting it online to UNION; For the assignment of your contract to the intermediary energy partner as well as the related administration in the back office, UNION and the respective energy partner are jointly responsible in the sense of the art. 26 GDPR.

UNION is responsible for the collection of information about the online processes, the information of the affected persons, the operation and security of the back office as well as the processing of your data subject rights. The energy partner is limited to the allocation of the business to his person and the access related to it. The further processing of your data for the implementation of the energy supply contract is the sole responsibility of UNION.

You can assert your rights against and against any of the jointly responsible parties. The central point of contact is UNION:
privacy@unionenergie.de

6. Storage time

We store your data only as long as this is necessary for the stated purposes or statutory storage obligations exist. Data in connection with the energy supply contract are stored for the duration of the contractual relationship and subsequently within the framework of the statutory storage periods (in particular § 257 HGB, § 147 AO). Interested parties or request data that does not lead to the conclusion of a contract and for which there is no continuing legal basis will be deleted or anonymized.

7. Your rights

In accordance with the legal requirements, you have the right to access (Art. 15), correction (Art. 16), deletion (Art. 17), restriction of processing

(Art. 18) and data portability (Art. 20 GDPR). You can revoke a given consent at any time with effect for the future (Art. 7 para 3 GDPR).

Right of objection (Art. 21 GDPR):

You have the right, for reasons arising from your particular situation, at any time against the processing of your data, which is referred to in Art. 6 para. 1 lit. f GDPR is based on objection. You can object to processing for direct marketing purposes at any time without giving reasons.

Right of complaint:

You have the right to complain to a data protection supervisory authority. UNION is the responsibility of the Land Commissioner for Data Protection and Freedom of Information Baden-Württemberg (LfDI BW), Heilbronner Straße 35

70191 Stuttgart

8. Minors

Our energy products are aimed at adults. Energy partners may not contact persons under 18 years of age or process their data. We do not knowingly collect personal data of minors.

9. Amendments to these Notes

We reserve the right to adjust this privacy policy from time to time so that it always meets the current legal requirements or reflects changes to our services. The current version shall apply.

Union GmbH

