

Data protection policy

This data protection policy is in accordance with the legal provisions of the European Union's General Data Protection Regulation (GDPR).

The protection of your privacy is very important to us.

In this privacy policy, we, Rodenstock GmbH, inform you about the processing of personal data when using our application CNXT.

The app CNXT enables opticians to automate the processing of customer data for the purpose of lens consultation/ordering.

In addition, our [general data protection policy](#) also applies.

1. Who is responsible for the processing of my data within the CNXT app?

The responsibility for the processing of your data when you are using the app, in accordance with the EU General Data Protection Regulation (GDPR) lies with

Rodenstock GmbH
Elsenheimerstraße 33
D-80687 München
Tel.: 089-7202-0
E-Mail: datenschutz@rodenstock.com

For all questions regarding data protection in connection with the use of our CNXT app you can also contact our data protection officer at any time. The data protection officer can be contacted at the above postal address as well as the previously specified e-mail address (heading: "FAO Data Protection Officer").

2. Data Processing within the use of the CNXT app

Data categories	Purpose of the processing	Legal basis
Contact Info Name First name Salutation Company Street House number Postcode City Country Business e-mail address Rodestock-customer number	Contacting, Communication	Art. 6 Para. 1 lit. b) GDPR
Identifiers Password	Identification and authentication of the user	Art. 6 Para. 1 lit. b) GDPR
Usage Data Product interaction	Generation of statistics on the frequency of use of the individual functions	Data is collected anonymously

3. Transfer of data

The data we collect is only transferred if:

- you have given your express consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR,
- the transfer is necessary for the assertion, exercise or defence of legal claims pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR and there is no reason to assume that you have an overriding interest worthy of protection in not having your data transferred,
- we are legally obliged to transfer your data according to Art. 6 para. 1 p. 1 lit. c GDPR or
- this is legally permissible and necessary according to Art. 6 para. 1 p. 1 lit. b GDPR for the processing of contractual relationships with you or for the implementation of pre-contractual measures that take place at your request.

Part of the data processing may be carried out by our service providers. If we transfer data to our service providers, they may only use the data to fulfil their tasks. The service providers have been carefully selected and commissioned by us. They are contractually bound to our

instructions, have suitable technical and organisational measures in place to protect the rights of the data subjects and are regularly monitored by us.

In addition, disclosure may take place in connection with official enquiries, court orders and legal proceedings if it is necessary for legal prosecution or enforcement.

Personal data is not transferred to third countries or international organizations.

4. When will your data be deleted?

In principle, we store personal data only as long as this is required for the fulfilment of contractual or legal obligations which are the reason for the collection of the data. After that, we delete the data immediately, unless we require the data until the expiry of the legal limitation periods for the purposes of evidence in civil claims or due to statutory retention requirements.

For evidentiary purposes, we have to retain contract data for three years after the end of the year the business relationship with you ends. According to statutory limitation periods, potential claims become time-barred no earlier than at this point in time.

After that, we still have to store part of your data for accounting purposes. We have an obligation to do so due to legal documentation requirements, which can arise from the Commercial Code, the Tax Code, the Banking Act, the Money Laundering Act and the Securities Trading Act. The retention periods for documents specified in the above legislation are two to ten years.

5. What are your data protection rights?

You have the right at any time to request information on the processing of your personal data by us. We will explain the data processing to you within the course of providing this information and furnish you with an overview of your stored personal data.

If data stored by us should be incorrect or no longer up-to-date, you have the right for this data to be corrected.

You can also request the deletion of your data. Should the deletion exceptionally not be possible due to other legal provisions, then the data is blocked, so that it is only available for this legal purpose.

Furthermore, you can restrict the processing of your data, e.g. if you are of the opinion that the data stored by us is not correct. You also have the right to data portability, in other words, upon your request, we forward a digital copy to you, containing the personal data that you have provided.

In order to assert the rights described here, you may contact us at any time, via the above-mentioned contact details. This also applies if you wish to receive copies of guarantees for evidence of a reasonable level of data protection.

Furthermore, you have the right to object to the data processing, which is based on Art. 6, Para. 1 e or f GDPR. Finally, you have the right to lodge a complaint at the data protection supervisory authority responsible for us. You can exercise this right at a supervisory authority in the member state of your residence, your employment or the place of the suspected breach.

6. Right of withdrawal and objection

You have the right, in accordance with Article 7, Para. 3 GDPR, to revoke consent once granted to us, at any time. As a consequence, we shall in future no longer continue to process the data that is the object of the consent. The revocation of the consent does not affect the lawfulness of the processing based on the consent up to the time of the revocation.

Insofar as we are processing your data on the basis of legitimate interests in accordance with Art. 6, Para. 1, Sentence 1 f GDPR, you have the right in accordance with Art. 21 GDPR, to raise an objection against the processing of your data, insofar as there are grounds for this, which arise from your special situation or where the objection is directed against direct advertising. In the latter case, you have a general right of objection, which we shall implement also without the need for you to give reasons.

If you wish to use your right to revoke or your right of objection, an informal notification to the above-mentioned contacts is sufficient

7. Amendment of the Privacy Policy

We occasionally update this Privacy Policy, for example when we are adjusting our website or if the legal, official or App Store requirements change.