Information on group-wide data consolidation (Kärcher Data Lake)

In order to offer you a uniform service and an optimally coordinated user experience across our various Kärcher services and offers, we inform you below about the central consolidation of your data.

1. Description and scope of data processing

We merge personal data from all digital and analog touchpoints (e.g., webshop, service, registration, app) in a central system (“Data Lake”).

The following data categories are processed as part of the consolidation in the group-wide data lake:

- **Master data, contract details and contact information:**
  This includes, e.g. identification and communication data (such as name, address, contact details), customer-related registration and account data.
- **Transaction, service and communication data:**
  This includes, e.g. ordering, service and repair information,
  product and service inquiries, communication and inquiry histories, other interactions with the company.
- **Interest and preference data:**
  This category includes, for example, information on newsletter subscriptions, product and service interests.
- **App data:**
  This includes information about the linking of devices to the app, as well as registration and account data within the app.

The data is merged via your email address to create a central customer profile.

The technical infrastructure of the data lake is operated by Alfred Kärcher SE & Co. KG.

2. Responsibility

Data processing within the central data lake is carried out by Alfred Kärcher SE & Co. KG and the respective local Kärcher sales company with which you are in contact.

3. Purpose of data processing

The data is merged in the central data lake for the following purposes:

- **Customer master data management** (Data quality, duplicate avoidance)
- **Improving customer service** (efficient processing of requests)
- **Product optimization** (based on anonymized data)

- **Marketing and customer communication** (Newsletter and customer communication as well as event-related information)

The central customer profile is not used to create comprehensive personalized profiles or for behavioral analysis.

4. Legal basis for data processing

The legal basis for this data processing is Art. 6 (1) (f) GDPR (legitimate interest). Our legitimate interest lies in particular in:

- efficiently coordinating group-wide customer relationships,
- ensuring the quality of data records (e.g., through deduplication),
- improving services on the basis of consistent data.

Product optimization is based on anonymized data and is no longer subject to the GDPR.

Insofar as marketing measures legally require prior consent – in particular when sending email advertising, unless an exception applies (e.g. for existing customer advertising) – processing is carried out exclusively on the basis of your consent pursuant to Art. 6 (1) (a) GDPR.

Further data-based personalization (especially involving multiple data sources such as device data or for behavioral analysis) will only take place on the basis of corresponding consent.

5. Data recipients

Only authorized employees of the Kärcher Group have access to the data in the Data Lake.

To provide the technical infrastructure (hosting), we use the services of a cloud service provider (Google) with EU data center locations. Additionally, for the technical operation of the data lake, we rely on support from IT service providers within the ZOI Group. The aforementioned technical service providers act exclusively as data processors within the meaning of Art. 28 GDPR and process personal data solely on the basis of our instructions. No use of the data for their own purposes or access for their own functional purposes (e.g., marketing or customer service) takes place.

We have concluded appropriate data processing agreements with the companies we use, which ensure that your data is processed exclusively in accordance with our specifications and in compliance with applicable data protection regulations.

6. Location and duration of storage

The data is stored on servers within the European Union.

If personal data is processed outside the European Union or the European Economic Area

should take place within the scope of technical support by service providers of the ZOI Group, we ensure with suitable guarantees (e.g. standard contractual clauses) that an adequate level of data protection is guaranteed.

The data will be stored in the data lake for as long as necessary to achieve the aforementioned purposes or until you object to the processing. Storage typically lasts for the duration of the active customer relationship. Statutory retention obligations (e.g., under commercial or tax law) remain unaffected and will result in the data being blocked accordingly.

7. Right of withdrawal and objection

You have the right to object at any time with effect for the future to the merging of your data from different sources for the purpose of legitimate interest.

You can withdraw your consent at any time with effect for the future. The lawfulness of the processing based on consent until you withdraw it remains unaffected.

To exercise your right to object and/or withdraw your consent, you can send us an informal notification by email to: **datenschutzbeauftragter@karcher.com**.

Technical implementation of the objection:

If you object to the merging, your email address will be added to an internal blacklist. This ensures that your data from the various source systems (webshop, app, service portal) remains permanently separate and that no central profile is created or updated. Data that has already been merged will be unlinked or deleted in this case, unless legal retention obligations prevent this.

8. Information on shared responsibility within the Kärcher Group

This information is intended to make transparent the essential contents of the agreement concluded between the companies of the Kärcher Group regarding joint data processing pursuant to Art. 26 GDPR.

1. What is the reason for the shared responsibility?

The Kärcher Group is an association of the following legally independent companies:

- Alfred Kärcher SE & Co. KG, Alfred-Kärcher-Str. 28-40, 71364 Winnenden

  (hereinafter referred to as the “parent company”)

- Kärcher Pty Ltd 385 Ferntree Gully Road Mount Waverley VIC 3149

(hereinafter referred to as the “responsible subsidiary”)

The Kärcher companies jointly process personal data within the framework of the data lake. The purposes of the data processing are jointly determined by the participating companies.

2. What did the companies involved agree on?

The following was specifically regulated:

- The parent company operates the technical infrastructure of the Data Lake, performs the data merging and matching of the consolidated datasets, and provides the central, consolidated customer information.
- The parent company and the subsidiaries each use the consolidated data for their respective defined purposes.
- The parent company is responsible for operating the Kärcher service “myKärcher” and independently collects personal data in this context. In this regard, it provides the required privacy notice regarding the Data Lake for app users.
- The respective subsidiaries are responsible for data collection in their local systems (e.g., webshop, service, customer account) and provide the corresponding data protection information for the data lake via these contact points.
- Access to the data consolidated in the data lake is strictly restricted: Only the parent company and the respective local Kärcher sales company responsible for the customer may access the consolidated customer profile. Access by multiple companies is only permitted with regard to master data, provided that it concerns a shared customer and the corresponding data was already available to the participating companies prior to the consolidation.

3. What does this mean for you as a data subject?

The agreement reached between the participating companies does not affect your rights as a data subject. You can assert all data subject rights (e.g., access, rectification, erasure, objection) against any of the joint controllers.