

KPC Privacy Policy

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Kommalkredit Public Consulting (KPC) manages funding programs and offers targeted consulting services and thus contributes to environmental, economic and social development in both the short and the long term. We have very high quality expectations for ourselves and we strive to meet and exceed them when implementing our projects. We also expect the very best from ourselves in terms of quality when it comes to protecting your data.

This privacy policy will provide information about the following items:

- **Who we are and why we collect your personal data**

KPC's activities are focused on three main areas:

- **Funding management**
Our main business area is the management of funding initiatives. We manage funding programs for climate and environmental protection on behalf of our clients in the public sector. In this area, we collect and process personal data on behalf of and as a service provider of our clients in the public service, including the Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology, the Federal Ministry of Agriculture, Regions and Tourism, the Climate and Energy Fund as well as several Austrian provinces.
- **Climate Austria**
Climate Austria is a platform for voluntary offsetting of greenhouse gas emissions. As the managing party in charge of Climate Austria, KPC operates the corresponding website as well as the web-based tool where you can calculate CO₂ emissions caused by your activities and compensate for them ("CO₂ calculator").
- **Consulting**
On the consulting side, we successfully support renowned national and international organizations and financial institutions.

The nature of collected data and our role with regards to the GDPR vary strongly depending on these three areas. Therefore, we are providing information about our privacy policy in separate chapters. In our consulting business, we apply the rules listed under "General information about data protection at KPC."

Data protection in our funding program business area

- **Which personal data do we process on which legal basis?**

KPC has been entrusted by public agencies with handling federal and regional funding programs including the support of projects that are part of Climate Austria. A detailed list of our clients is available at the end of this document. In this business area, KPC works on behalf of and on account of the client in question (representative). In order for us to provide this service, we collect both personal and project data from applicants. We only collect data provided by the applicant itself or by third parties (credit agencies like Compass-Verlag GmbH, CRIF GmbH, credit report agencies like Kreditschutzverband and public sources like Firmenbuch, Vereinsregister, Grundbuch, etc.) that are required for verifying if the funding conditions defined by law or other legal instruments are met,

signing the funding agreement and making the funding payments. In addition, we are required to monitor the projects we fund in order to ensure a long-term positive environmental impact.

The legal basis for this are pertinent federal and regional laws, the corresponding funding guidelines, EU legislation such as, especially, state aid law as well as other relevant stipulations related to the award of funding (Court of Auditors Act, Transparency Database Act etc.). By entering your data in the (online) application or the registration platform, you confirm that you acknowledge the processing of your data as defined by the indicated legal stipulations.

If you share data of third parties (project consultants, planners, bank staff etc.) with us during the application process, please note that you need to ask for their consent beforehand.

- **With whom might we share your data?**

As part of its funding program activities, KPC is legally required to share data collected on behalf of our clients with them, with assessment and authorization bodies, clients and, in the case of shared funding and in order to avoid undesired double funding, with other funding bodies. In addition, national and EU notification duties exist in relation to the award of funding and/or subsidies. In the case of an audit, we may be required to share data with the European Court of Auditors as well as the Austrian Federal Court of Auditors, the Regional Court of Auditors as well as other national and regional bodies that have the authority to request such data. Beyond that, no data will be shared in or outside the EU.

- **How long do we store data?**

As a processor, we strictly comply with the storage and archiving periods mandated by our clients and based on the legal framework indicated above. In principle, there is a need for different statistical evaluations over longer periods of time (10 years and more), for example, to prove the effects of a funding program since its inception.

At this point, we would like to point out that we are contractually obligated to keep your data for a specific period of time for audit and verification purposes (for details, please see above). We kindly ask for your understanding that we will not be able to meet any requests for early deletion or withdrawal of your consent to data processing.

Data protection for Climate Austria business activities

- **Which personal data do we process and on which legal basis?**

As the financial and administrative party responsible for Climate Austria, KPC is the data controller as defined by the GDPR.

CO₂-Calculator: We only collect data required to calculate CO₂ emissions caused and to handle their compensation. By using the corresponding online tool, you explicitly accept that the entered data will be processed.

Support of international climate protection projects: legal basis is the cooperation agreement and its stipulated conditions.

- **With which additional recipients might we share data?**

We will not share your data with anyone in our outside the EU.

- **How long do we store data?**

We will only store your data as long as needed for us to provide our services or to comply with the storage period required by law.

General information about data protection at KPC

- **KPC newsletter**

To keep our clients informed, we send out our KPC newsletter with information about renewable energy, energy efficiency, mobility management, municipal water management, flood protection and contaminated land remediation as well as events, important deadlines and news from KPC.

Who receives our KPC newsletter?

Our newsletter is sent to registered subscribers only. We collect statistical information for optimization purposes. Personal data is saved and used exclusively for sending out the newsletter until the subscriber decides to unsubscribe. We do not share this data with third parties.

When signing up for our newsletter, you explicitly agree to the processing of your data.

Mailchimp

We use Mailchimp to send out our newsletter. MailChimp is an e-mail marketing service offer provided by "The Rocket Science Group, LLC," 675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308, USA. During the registration process for our newsletter, the data you have indicated when signing up is transferred to MailChimp and stored there.

MailChimp offers comprehensive analysis options about how newsletters are read and used. These analyses are group-specific and KPC does not use them for individual evaluations. In addition, MailChimp uses Google Analytics and might include it in the newsletter. All newsletters have a clearly marked link for unsubscribing, which can be used to unsubscribe from our newsletter service at any time.

Unsubscribing from our newsletter

As a matter of course, you have the option of unsubscribing from our newsletter and of withdrawing the consent you have provided for the future. To do that, please click on the button in the newsletter you have received or on the following [hyperlink](#). When you unsubscribe, we will delete all your data from our systems.

- **Data protection for users of our websites**

Our websites use Google Analytics, a web analysis service by Google Inc. ("Google"). Google Analytics relies on so-called cookies, which are text files stored on your computer and which allow for the

analysis of how you use the website. Information generated by such cookies regarding your use of the website is usually transferred to a Google server in the US and stored there.

KPC anonymizes IP addresses

Please note that we have added the Google Analytics code "gat._anonymizeIp();" to our websites to allow for the anonymized collection of IP addresses (the so-called IP masking). However, Google will previously shorten your IP address in the member states of the European Union and other countries that belong to the European Economic Area. In exceptional cases only, the full IP address is transferred to a Google server located in the USA and shortened there.

On behalf of the operator of this website, Google will use this information to analyze the way you use this website, compile reports about the website activity and to provide additional services related to the use of the website and the Internet to the website operator. Google will not combine the IP address transferred by your browser to Google Analytics with other data. You can prevent that cookies will be stored by choosing the pertinent setting in your browser. However, please note that if you deactivate cookies, you will not be able to fully use all the functionalities of this website.

Disabling collection with a browser plugin

In addition, you have the option of preventing that the data created by cookies and related to your use of the website (including your IP address) will be collected by Google and processed by Google by clicking on this [link](#) to download the browser plugin and install it.

Deactivating Google Analytics

You can prevent data collection by Google Analytics by clicking on the link available in the Privacy section of our homepage. An opt-out cookie will be placed in your browser to prevent that data will be collected when you visit this website in future.

What does IP address anonymization mean?

For data protection activists, IP addresses are so-called personal data. Anonymizing IP addresses means obscuring the IP address of a user visiting a website so that Google can no longer directly match the tracking data compiled via Google Analytics.

Additional information

Additional information about the terms of use and data protection is available at <https://www.google.com/analytics/terms/gb.html> and at <https://policies.google.com/?hl=en>

Sources

The additional text in the paragraphs "Disabling collection with a browser plugin" and "Additional information" was taken from:

www.datenschutzbeauftragter-info.de

- **Applying at KPC**

We also believe in protecting the data of people who apply for jobs at KPC. We will delete all data and documents you send us as part of a job application after six months. In the case of unsolicited

applications, we will delete them after 12 months. If, when sending your documents, you explicitly ask us to keep them on file, we will do that until further notice.

Until further notice, we will store CVs explicitly sent to us in relation with a possible collaboration for international consulting projects in our partner and expert database.

- **Procurement procedures**

If KPC carries out procurement procedures for its clients, it acts either as data controller or as a processor in accordance with the GDPR. Any bidder participating in the process will be asked to give its consent to process and, where appropriate, to transfer its data. The data will be stored during the duration of the award procedure until the final award and as long as the statutory retention requirements or a legitimate interest exist.

- **Which measures do we take to protect your personal data?**

We have taken a variety of organizational and technical measures to protect your data against unauthorized transfer, unlawful use, modification and destruction. This applies both to data we handle as processors in our funding management business area as well as for data we process in all other areas in our role as controller.

We use physical, electronic and procedural security measures to protect data. We protect our servers with firewalls and antivirus programs. At KPC, the use of backup and recovery systems as well as role and authorization concepts is standard practice. To increase the security level, we use encryption procedures on a regular basis (e.g. SSL for Internet transmission). Our staff members are bound to data secrecy and are regularly trained.

We enter into written data processing agreements with all third-party businesses that support us in data processing operations (provision of IT infrastructure, servers, website providers, payment providers etc.) and by doing so, require them to comply with all data protection requirements and to maintain and provide an appropriate level of protection in their area of responsibility.

- **What are your rights regarding your personal data?**

Data protection law grants you a variety of rights (right to information, right to rectification, deletion, restriction of processing, data portability and right to object). In the area of funding management, our clients have assigned us the duty to safeguard your rights, as we are the data processors.

If you have any questions regarding this topic, please contact Petra Fleischmann (p.fleischmann@kommunalkredit.at).

Furthermore, you have the right to submit a complaint to the Austrian Data Protection Authority (Datenschutzbehörde) if you believe that we have breached obligations under the General Data

Protection Regulation. The Austrian Data Protection Authority is the national supervisory authority for data protection in the Republic of Austria.

Final information

If you have questions about our privacy policy or general questions about data protection at KPC, please contact Petra Fleischmann (p.fleischmann@kommunalkredit.at).

From time to time, we might adapt our privacy policy so that it always reflects the latest legal requirements and covers all our business areas. We will not restrict your rights as defined in this privacy policy without your explicit consent.

The objective of this privacy policy is to show you the measures and processes we use to comply with legal requirements regarding the protection of your personal data. Please get in touch with us if you believe that the processing of your data violates data protection law or that your data protection rights have otherwise been infringed.

Contact information

Kommunalkredit Public Consulting GmbH (KPC)

Petra Fleischmann

Phone: +43 (0)1/31631-332

E-mail: p.fleischmann@kommunalkredit.at

- Our clients as controllers as defined by this privacy policy
Environmental subsidies in Austria, refurbishment initiative, contaminated land remediation, kamobil:

Austrian Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology

E-mail: datenschutz@bmk.gv.a

Water management, flood protection:

Austrian Ministry of Agriculture, Regions and Tourism

E-mail: datenschutzbeauftragter@bmlrt.gv.at

Funding programs of the Climate and Energy Fund:

Climate and Energy Fund

E-mail: datenschutz@klimafonds.gv.at

Regional funding programs:

Lower Austria – "E-mobility in Lower Austria"

Office of the Regional Government of Lower Austria

Department of Environmental and Energy Management (RU3)

E-mail: klaus.bottensteiner@noel.gv.at

buergerbuero.landhaus@noel.gv.at

Salzburg – Climate and Energy Strategy Salzburg 2050

Regional Government of Salzburg

Privacy Policy Officer

Phone: +43 662 8042-2378

E-mail: datenschutz@salzburg.gv.at

Styria - Follow-up e-mobility funding program

Office of the Regional Government of Styria

Department 15 – Special Department for Energy and Residential Building

E-mail: abteilung15@stmk.gv.at

dsb@stmk.gv.at

Tyrol - Funding for Energy-Saving Measures and Renewable Energy Sources

Office of the Regional Government of Tyrol

Department of Economy, Municipalities and Finance

E-mail: gr.wirtschaft.gemeinde.finanzen@tirol.gv.at

datenschutzbeauftragter@tirol.gv.at

Tyrol – Funding for (e-)bikes

Office of the Regional Government of Tyrol

Traffic & Road, traffic planning

E-Mail: verkehrsplanung@tirol.gv.at

datenschutzbeauftragter@tirol.gv.at

Vorarlberg - Funding for Energy-Saving Measures and Renewable Energy Sources

Office of the Regional Government of Vorarlberg

E-mail: dsba@vorarlberg.at

Vienna - Funding for Photovoltaic Facilities

Magistrate of the City of Vienna

Municipal Department 20 – Energy Planning

E-mail: post@ma20.wien.gv.at
datenschutzbeauftragter@wien.gv.at