**Privacy policy in accordance with Art. 13 of the General Data Protection Regulation ("GDPR") for the commercial customer portals (consisting of the contract management system "VMS", the nomination portal "NMP" and the customer cockpit)**

This privacy policy provides you with information on how we process your personal data when you visit our commercial customer portals and what rights you have under the GDPR. Open Grid Europe GmbH takes the protection of your personal data seriously and therefore attaches particular importance to compliance with the applicable legal requirements, this applies in particular to the requirements of the GDPR.

**Processed data**

When using the commercial customer portals, we collect the personal data you voluntarily provide (hereinafter referred to as "**Professional Contact Data**"). In addition, technical data (hereinafter referred to as "**Technical Usage Data**") is processed when using the commercial customer portals. In particular, the following personal data is processed:

- Professional Contact Data (surname, first name, e-mail address, telephone number, employer, username and user ID, language setting, role title in authorization management)
- Technical Usage Data
    - Audit logs (Business Process Logging): User ID, timestamp of action, type of action, and affected data object
    - Session data: Session tokens for authentication via single sign-on
    - Automatically generated log data (IP address, time stamp, URLs / request paths accessed, HTTP-referrer (referring URL), user agent information (browser and operating system identifier))

**Name and contact details of the controller**

The processing of this data is carried out under the responsibility (Art. 4 No. 7 GDPR) of Open Grid Europe GmbH, Kallenbergstraße 5, 45141 Essen (hereinafter referred to as "**OGE").**

**Contact details of the Data Protection Officer**

OGE has appointed a company Data Protection Officer, whom you can contact at any time with regard to all questions regarding data protection at oge-datenschutz@oge.net.

**Purpose of processing**

The purpose of processing the Professional Contact Data is to be able to identify you as an authorised user and to create you or the company you represent as a customer in our commercial customer portals. Specifically, your Professional Contact Data is required to be able to contact you or the company you represent after completion of the registration process in order to process booking enquiries and to be able to properly process concluded transport contracts and internal orders. They are also needed to carry out and manage nomination processes related to the balancing group used by your company. Without providing your Professional Contact Data or alternative contact details, registration for the commercial customer portals and subsequently the conclusion of transport contracts and internal orders, the submission of nominations and the query of nomination processing and matching status is not possible.

**Legal basis for processing**

The legal basis for the processing of all personal data is Art. 6 para. 1 lit. f) GDPR. The legitimate interest in the processing of your data with regard Professional Contact Data is in OGE's interest in initiating transport contracts and internal orders and being able to process them properly. For this purpose, it is necessary to be able to get in touch with employees of the transport customer and downstream network operators in order to request information required for the transport. In addition, the processing of personal data is necessary for the further processing of the contract, in particular invoicing.

With regard to Technical Usage Data, the legitimate interest lies in being able to deliver the content of the website used correctly and to be able to protect it from potential cyber attacks.

**Recipients of personal data**

The Professional Contact Data will be forwarded to IT and system service providers who provide technical operation and support services on behalf of OGE.

The Technical Usage Data is forwarded to IT hosting and infrastructure service providers of OGE as well as IT security and monitoring service providers to ensure secure system operation.

**Retention period**

All personal data will be deleted as soon as their processing is no longer necessary for the purpose for which they were collected. Insofar as statutory retention obligations apply, the data will be deleted after the expiry of the respective retention period.

**Transfer to third countries**

It is not intended to transfer personal data to recipients in third countries outside the European Economic Area.

**Your rights**

You have the following rights under the GDPR in relation to the processing of your personal data by OGE:

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to withdraw your consent at any time with effect for the future

To exercise your rights set out above, you can contact OGE or the OGE Data Protection Officer at any time using the contact details above. In addition, you can complain to a supervisory authority at any time about the processing of your personal data by OGE.