

Data Protection Policy

Eventful Management GmbH

Mühlhauser Feld 3, 85664 Hohenlinden, Germany

Governing regulation: EU GDPR 2016/679 • Bundesdatenschutzgesetz (BDSG)



Approved: January 2026 • Next review: January 2027

| Data Controller | Details |
|--------------------------------|-----------------------------------------------------------------|
| Organisation | Eventful Management GmbH |
| Registered address | Mühlhauser Feld 3, 85664 Hohenlinden, Germany |
| Company registration | Amtsgericht München, HRB 135284 |
| Data protection contact | Edwin Courts, Director |
| Email | munich@eventful-management.eu |
| Telephone | +49 (0)89 90 13 98 68 |
| Supervisory authority | Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Ansbach |

Eventful Management GmbH (“the company”, “we”, “us”) is committed to protecting the privacy and personal data of everyone with whom we work — employees, freelancers, clients, suppliers, event guests and website visitors. We process personal data in accordance with the EU General Data Protection Regulation (GDPR) 2016/679, the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG), and any other applicable data protection legislation.

This policy sets out how we collect, use, store, share and protect personal data, and explains the rights available to individuals whose data we hold. It applies to all personal data processed by the company in any format — electronic or paper — and is binding on all employees, freelancers and sub-contractors acting on behalf of Eventful Management GmbH.

Approved on behalf of Eventful Management GmbH:

| | |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
|  Edwin Courts Director / Data Controller |  John Cullen Director |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|

Date: January 2026

Document Revision History

| Date | Status |
|--------------|----------------------------------------|
| January 2026 | Original document created and approved |

1. Data Protection Principles

All personal data processed by Eventful Management GmbH must comply with the six data protection principles set out in Article 5 of the GDPR. We are accountable for, and must be able to demonstrate compliance with, each of the following:

- Lawfulness, fairness and transparency — personal data is processed on a valid legal basis, in a manner that is fair to the individual, and with appropriate transparency about how it will be used
- Purpose limitation — personal data is collected for specified, explicit and legitimate purposes and is not processed in any manner incompatible with those purposes
- Data minimisation — we collect and hold only the personal data that is necessary for the stated purpose; we do not hold data “just in case”
- Accuracy — personal data is kept accurate and, where necessary, up to date; inaccurate data is corrected or erased without delay
- Storage limitation — personal data is kept only for as long as necessary for the purpose for which it was collected, in accordance with the retention schedule in Section 7
- Integrity and confidentiality — personal data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage

2. Personal Data We Hold and Why

Eventful Management GmbH processes personal data relating to the following categories of individuals, for the purposes described:

2.1 Employees and Freelancers

We hold the following data about current and former employees and engaged freelancers:

- Identity and contact data: full name, address, date of birth, nationality, emergency contact details
- Employment data: job title, start and end dates, contract terms, working hours, holiday and absence records
- Payroll and financial data: bank account details, tax identification number (Steuer-ID), salary, expense claims
- Health and safety data: records of site induction attendance, training certifications, accident and incident reports, medical information provided in an emergency context
- Performance and disciplinary records where applicable

Legal basis: performance of employment contract (Art. 6(1)(b) GDPR); legal obligation (Art. 6(1)(c) GDPR) for tax, payroll and H&S records; legitimate interest (Art. 6(1)(f) GDPR) for operational records.

2.2 Clients and Prospective Clients

We hold the following data about client contacts and prospective clients:

- Identity and contact data: name, job title, company name, business address, telephone, email
- Project and commercial data: event briefs, proposals, contracts, purchase orders, invoices and correspondence
- Communication records: emails, meeting notes and other correspondence relating to projects

Legal basis: performance of contract or pre-contractual steps (Art. 6(1)(b) GDPR); legitimate interest in maintaining client relationships and business records (Art. 6(1)(f) GDPR).

2.3 Suppliers and Sub-contractors

We hold the following data about supplier and sub-contractor contacts:

- Identity and contact data: name, company, address, telephone, email
- Commercial and compliance data: contracts, invoices, insurance certificates, qualification records, bank details for payment

Legal basis: performance of contract (Art. 6(1)(b) GDPR); legal obligation for financial and tax records (Art. 6(1)(c) GDPR).

2.4 Event Guests and On-site Personnel

Where required by clients or venues, we may process limited personal data relating to event guests or other on-site personnel:

- Accreditation data: name, organisation, contact details, access permissions
- Health and safety data: emergency contact details, medical conditions relevant to on-site safety (with explicit consent)
- Safety briefing records: confirmation of receipt of site induction (Nachweisbuch)

Legal basis: legitimate interest in managing safe on-site operations (Art. 6(1)(f) GDPR); legal obligation for H&S records (Art. 6(1)(c) GDPR); consent where sensitive health data is involved (Art. 6(1)(a) / Art. 9(2)(a) GDPR).

2.5 Website Visitors

Our website at www.eventful-management.eu may collect the following data from visitors:

- Analytics data via Google Analytics 4 (GA4): anonymised usage data including pages visited, session duration and approximate geographic location. IP addresses are anonymised before processing
- Contact form data: name, email address and message content submitted via the website contact form
- Cookie data: as described in our website cookie notice

Legal basis: consent for non-essential cookies and analytics (Art. 6(1)(a) GDPR); legitimate interest for security and fraud prevention (Art. 6(1)(f) GDPR).

3. How We Share Personal Data

We do not sell personal data to third parties. We share personal data only where necessary and only with the following categories of recipient:

- Payroll and accountancy services: our external accountant and payroll provider receive employee payroll data under a data processing agreement
- Tax and regulatory authorities: we share data with the Finanzamt, Sozialversicherung providers and other statutory bodies as required by law
- Insurance providers and brokers: insurer and broker contacts may receive relevant personal and project data in connection with insurance cover and claims
- IT and cloud service providers: we use cloud services (including email hosting, file storage and project management tools) under appropriate data processing agreements ensuring GDPR-compliant data handling
- Clients and venues: limited personal data about on-site personnel (e.g. accreditation lists) may be shared with clients or venues where required for event delivery
- Law enforcement and regulatory bodies: we disclose personal data to competent authorities where required by law or pursuant to a lawful request

Where we engage third-party processors to handle personal data on our behalf, we ensure that appropriate data processing agreements (Auftragsverarbeitungsverträge – AVV) are in place, as required by Article 28 GDPR.

4. International Data Transfers

Eventful Management GmbH works with clients and delivers events across Europe and internationally. Where personal data is transferred outside the European Economic Area (EEA), we ensure that appropriate safeguards are in place.

- Transfers to the United Kingdom: the UK has been granted an adequacy decision by the European Commission, permitting transfers of personal data from the EEA to the UK without additional safeguards. We process data relating to UK-based clients and contacts under UK GDPR as well as EU GDPR where applicable
- Transfers to the United States and other third countries: where we use US-based cloud services or software providers (for example Google Workspace), we ensure that the provider participates in the EU–US Data Privacy Framework or that Standard Contractual Clauses (SCCs) are in place
- Event-related transfers: where events are delivered outside the EEA, limited operational data may be shared with local venue staff or authorities; in such cases we apply appropriate case-by-case safeguards

5. Your Rights

Individuals whose personal data we hold have the following rights under the GDPR. To exercise any of these rights, please contact us at munich@eventful-management.eu. We will respond within one month of receiving a valid request.

| Right | What it means | Notes |
|--------------------------------|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Access (Art. 15) | You may request a copy of the personal data we hold about you and information about how we use it | We will provide this within one month; complex requests may take up to three months |
| Rectification (Art. 16) | You may ask us to correct inaccurate or incomplete personal data | We will correct the data without undue delay |
| Erasure (Art. 17) | You may ask us to delete your personal data in certain circumstances | This right does not apply where we have a legal obligation to retain the data |
| Restriction (Art. 18) | You may ask us to pause processing of your data while accuracy or lawfulness is assessed | Data will be retained but not processed during the restriction period |
| Portability (Art. 20) | You may ask for your data in a structured, commonly used machine-readable format | Applies to data processed by automated means on the basis of consent or contract |
| Objection (Art. 21) | You may object to processing based on legitimate interest, including direct marketing | We will stop processing unless we can demonstrate compelling legitimate grounds |
| Withdraw consent | Where processing is based on consent, you may withdraw it at any time | Withdrawal does not affect the lawfulness of processing before withdrawal |

6. Data Security

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, accidental loss, destruction, disclosure or alteration. These measures include:

- Access controls: personal data held in electronic systems is protected by password authentication; access is restricted to employees and contractors with a legitimate need
- Encryption: sensitive data (including payroll, banking and personal identification data) is stored and transmitted using encryption where technically practicable
- Physical security: paper records containing personal data are stored in locked cabinets at our Hohenlinden premises and are accessible only to authorised staff
- Supplier due diligence: we assess the data security practices of key IT service providers and cloud platforms before engagement and require GDPR-compliant data processing agreements
- Staff awareness: all employees and relevant sub-contractors are informed of their data protection obligations as part of their induction; this policy is made available to all staff
- Breach response: in the event of a personal data breach, we will assess the risk to affected individuals and notify the Bayerisches Landesamt für Datenschutzaufsicht (BayLDA) within 72 hours where required under Article 33 GDPR, and notify affected individuals without undue delay where the breach poses a high risk to their rights and freedoms

7. Data Retention

We retain personal data only for as long as necessary for the purpose for which it was collected, and in any event no longer than required by applicable law. The following minimum retention periods apply:

| Data category | Retention period | Legal basis |
|----------------------------------------------------------|-----------------------------------------------------|----------------------------------------------------|
| Financial records (invoices, contracts, bank data) | 10 years | HGB §257 / AO §147 — German commercial and tax law |
| Business correspondence (emails, letters, project files) | 6 years | HGB §257 — German commercial law |
| Employee payroll records | 10 years | AO §147 — German tax law |
| Employee personnel files (general) | Until end of employment + 3 years | Limitation period for employment claims |
| Health and safety training records (Nachweisbuch) | 5 years after the event / end of employment | DGUV Vorschrift 1 / BetrSichV |
| Accident and incident records | 5 years (longer if reportable injury) | DGUV reporting requirements |
| Supplier and sub-contractor records | 6 years after last transaction | HGB §257 |
| Client project files | 6 years after project completion | HGB §257 / contractual limitation periods |
| Job application data (unsuccessful applicants) | 6 months after decision | AGG limitation period for discrimination claims |
| Website analytics data (GA4) | 14 months (GA4 default, anonymised) | Consent / cookie policy |
| CCTV footage (if applicable at premises) | 30 days unless required for an investigation | Legitimate interest / proportionality |

At the end of the applicable retention period, personal data is securely deleted from electronic systems and paper records are shredded. Where data is held by third-party processors, deletion is requested in accordance with the relevant data processing agreement.

8. Employee and Freelancer Obligations

All employees and sub-contractors handling personal data on behalf of Eventful Management GmbH must comply with this policy and with the GDPR and BDSG. In particular:

- Personal data encountered in the course of work must not be disclosed to unauthorised persons, whether inside or outside the company
- Personal data must not be removed from company systems or premises without authorisation, and must not be stored on personal devices without explicit approval
- Any suspected personal data breach — including lost devices, unauthorised access, misdirected emails or disclosure to the wrong person — must be reported to a director immediately, and no later than within 24 hours of discovery
- Personal data must be used only for the purpose for which it was collected and disclosed; it must not be used for personal gain or shared with third parties outside the scope of this policy
- Requests from individuals to exercise their data protection rights must be forwarded to a director immediately without any delay or acknowledgement by the receiving employee

Breach of this policy by an employee or sub-contractor may result in disciplinary action and, in serious cases, may constitute a criminal offence under the BDSG or GDPR.

9. Complaints and Supervisory Authority

If you have a concern about how Eventful Management GmbH handles your personal data, please contact us in the first instance at munich@eventful-management.eu. We will endeavour to resolve your concern promptly and transparently.

If you are not satisfied with our response, or if you believe we are processing your personal data unlawfully, you have the right to lodge a complaint with the relevant supervisory authority. For Eventful Management GmbH, the competent supervisory authority is:

| | |
|------------------|------------------------------------------------------------------------|
| Authority | Bayerisches Landesamt für Datenschutzaufsicht (BayLDA) |
| Address | Prömenadenplatz 18, 91522 Ansbach, Germany |
| Website | www.lda.bayern.de |
| Email | poststelle@lda.bayern.de |
| Telephone | +49 (0)981 180093-0 |



Individuals in the United Kingdom may also lodge a complaint with the UK Information Commissioner's Office (ICO) at www.ico.org.uk in relation to the processing of their personal data by the company.

10. Policy Review

This policy is reviewed and updated at least annually by the directors, and immediately following any significant change to the company's data processing activities, applicable legislation, or guidance from the supervisory authority.

The current issue of this policy is effective from January 2026. The next scheduled review is January 2027.

Approved on behalf of Eventful Management GmbH:

| | |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
|  Edwin Courts Director / Data Controller |  John Cullen Director |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|

Date: January 2026