

**SCC EVENTS GmbH Data Protection Policy
for Participation in the Sports Event
BMW BERLIN-MARATHON 2024**

The following English version of the privacy notice is provided solely to aid in understanding. In the event of any conflicts arising about wording, the German original version shall be exclusively binding for all parties involved.

With this notice, we would like to inform you about the processing of your personal data by SCC EVENTS GmbH (hereinafter also referred to as “SCC” or “we”) and the rights to which you are entitled under the Data Protection Act in connection with registration for the drawing and participation in our event BMW BERLIN-MARATHON 2024.

1. Responsible for data processing and data protection officer

SCC EVENTS GmbH
Olympiapark Berlin, Hanns-Braun-Strasse / Adlerplatz, 14053 Berlin
Managing directors: Christian Jost, Jürgen Lock
e-mail: informationspflicht@scc-events.com
Phone: 030 / 30 12 88 - 10
Fax: 030 / 30 12 88 - 20

The data privacy officer can be contacted by post at the above address with the keywords “Data Privacy” or by e-mail: datenschutz@scc-events.com.

2. Purposes and legal basis of data processing

We process your personal data in accordance with the legal regulations of the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant laws (e.g. tax laws).

The processing of your personal data is carried out within the scope of your registration for the drawing and your participation in our above-mentioned sporting event, in particular for the organisation, implementation and handling of all related processes.

Prerequisite for the registration for our sports event is the existence of an active user account in our online booking portal (<https://login.scc-events.com/s/>) in accordance with the General Terms and Conditions (GTC) (<https://login.scc-events.com/s/terms-conditions>) and the valid terms of participation for the sports event (<https://login.scc-events.com/s/terms-participation>).

The legal basis for the lawful processing of your personal data is derived from:

- A. Article 6 (1) lit. b) GDPR: for the fulfilment of contractual obligations and pre-contractual measures: Processing is carried out for the purpose of initiating (here: the drawing of race entry entitlements) and/or concluding a contract for participation in the BMW BERLIN MARATHON 2024, taking into account the applicable terms of participation. This includes all data required for the processing of your individual order, advance booking or booking of your participation in the sporting event. Especially when booking a race entry as Fast Runner, appropriate proof of your age and qualification must be provided (upload option for proof of age at registration). The provision of third party services (such as the creation of the 4-day combo ticket by BVG) and the associated data processing activities are also carried out on the grounds of this legal basis. The scope of the data is supplemented by mandatory data processing in connection with the use of the online booking portal, available at: <https://www.scc-events.com/en/privacy-information>.

After the race entry drawing, you will receive an e-mail informing you whether or not the drawing will allow for your participation in the sports event.

During the execution of the sports event in which you are participating, we collect and process further data from you on the basis of the aforementioned legal basis. This includes in particular: Timing data, results data and competition lists as well as data for the documentation of rule violations, starting bans and for medical care, if applicable. Information on pre-ordered, offered and published photo and video recordings, which are processed in the course of participation in the sports event, can be found at <https://www.scc-events.com/en/privacy-information>.

- B) Article 6 (1) lit f) GDPR on the basis of a weighing of interests: e.g. to assert legal claims, to defend ourselves in legal disputes, to guarantee IT security, to display and publish results lists, for the purpose of direct advertising and event reminders (post and e-mail), for media coverage by the press and media, to document advertising measures for sponsors and partners, for the creation and evaluation of statistics, as well as, if necessary, the handing over of statistical reports to sponsors and partners, to document competitions and recognise records, to create professional competition images (photo and video) by exclusive photo service providers. Information on pre-ordered, offered and published photo and video recordings processed in the course of your participation in the sports event is available at <https://www.scc-events.com/en/privacy-information>.
- C) Article 6 (1) lit. c) to comply with legal obligations such as commercial and tax law retention obligations, corporate, data protection and civil law obligations or regulatory requirements in compliance with the relevant legal regulations.
- D) Article 6 (1) lit. a) GDPR with your consent e.g. for the recording of emergency contact data, to subscribe your registered e-mail address for the newsletter, to participate in the Abbott World Marathon Majors (AWMM) ranking, in the AWMM Age Group Championship and to display the AWMM star finishers on the website www.worldmarathonmajors.com in accordance with the terms of participation, to declare whether contact is wanted after the drawing in case of not getting a race entry, to make use of sponsor offers in the digital event bag, to use the marathon App, or for other purposes explicitly described in the respective declaration of consent.
- E) Article 9, Para. 2 lit. a) GDPR with your consent, e.g. when performing the PAPS test on our website www.paps-test.de/en and generating, using and storing the PAPS key.

If we have been granted permission to process personal data for specific, previously mentioned purposes, the legality of this processing is based on the consent. Consent that has been granted can be revoked at any time. The revocation of consent does not affect the lawfulness of the data processed until revocation.

Processing activities related to the online booking portal are described in the user account privacy policy, available at: <https://www.scc-events.com/en/privacy-information>.

Processing activities related to the creation and publication of photos and videos taken during and after the sports event are described in the “Photo and Video” privacy policy, available at: <https://www.scc-events.com/en/privacy-information>.

3. Recipients or categories of recipients of personal data

In order to fulfil our contractual services and legal obligations, your data is partly processed in part by external service providers and partners if this is necessary to fulfil the aforementioned purposes and is permitted by law. In doing so, we always follow the provisions of data protection law, in particular any processing carried out by service providers engaged by us only takes place after the conclusion of contracts with a corresponding confidentiality clause.

Recipient	Purpose of disclosure
Transport and shipping service provider	Delivery of ordered products, postal and parcel delivery
IT service provider	Servicing, maintenance and servicing of IT systems (hardware and software)
Telecommunication service provider	Transport and storage of connection data
Website Host	Provision of contact and registration forms as well as published information and images, PAPS test, hosting of the user portal and other Internet sites
E-mail provider	Transport of e-mails and attachments, newsletter dispatch
Salesforce.com Germany GmbH	User portal and participant database
Print Shop	Creation and dispatch of print products
Authorities	Fulfilment of legal obligations to provide information and notification
Berliner Verkehrsbetriebe AöR (BVG)	Creation of digital 4-days combo ticket (public transport ticket), transmission of participants first and last name for personalization
Law firms and courts	Enforcement of claims, defence in legal disputes
Sports Club Charlottenburg e.V.	Organisation of sports events
Data destruction service provider	Disposal of files and data carriers
Medical Institutes	Medical care before and during the event, reporting and evaluation of medical incidents, organisation of massage appointments
Doping Associations	Doping tests for records according to association rules
Medal engraver	Medal engraving
SCC photographers	Creation of photo and video recording
Sportograf GmbH & Co. KG (exclusive photo service provider)	Creation of photographs, transmission of participants data (bib number and date of birth) for the allocation of the created competition pictures to enable orders
mika:timing GmbH	Timekeeping, timer, result service, hosting and provision of result lists and digital certificates
Generali Insurance AG	Conclusion of a cancellation insurance
Press	Reporting, interviews, photo and video recordings
Corussoft	BMW BERLIN-MARATHON app
Fanomena GmbH	Administration and hosting of offers in the digital event bag
Sponsors and advertising partners	Documentation and reporting, personalised vouchers
Maurten AB	Dispensing ordered products
adidas AG	Parcel delivery of ordered products, Provision of statistical reports on the number of participants and gender division as part of the "digital shoecounting" project*
Sports associations	Recognition and listing of records
Public website(s) of SCC, sponsors, partners, service providers and the press	Publication of event information, photo and video recordings and result lists
Social media platforms (SCC profiles)	Publication of event information, photo and video recordings
Video platforms	Publication of video recordings and photo series

In the context of the publication of personal data (result lists, competition results, photo and video recordings) on our Internet pages, on social media profiles, on video platforms or vis-à-vis the supervising sports associations, it cannot be excluded that personal data may be transferred to other states outside the European Economic Area (EEA) (so-called third countries). Further information on the transfer of such data to third countries can be found under point 6).

In general, when publishing personal data on the Internet (regardless of the platform selected), it cannot be ruled out that this data may also be accessed from countries that do not have an adequate level of data protection. A permitted publication of personal data on the Internet does not constitute a transfer of personal data to a third country in this sense.

Processing activities in connection with the creation and publication of photo and video recordings during and after the sporting event are described in the “Photo and Video” data protection information, available at: <https://www.scc-events.com/en/privacy-information>.

The operators of the social media platforms are jointly or individually responsible and are listed below:

- 1 Twitter: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland
- 2 Facebook: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- 3 Instagram: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

The operators of the video platforms are own responsible parties or order processors and are listed below:

- 1 Vimeo: Vimeo Inc., 555 West 18th Street, New York, 10011, USA
- 2 YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Our sports event is organised under the supervision of the following associations:

- 1 Deutscher Leichtathletik-Verband (DLV), Alsfelder Strasse 27, 64289 Darmstadt
- 2 Berliner Leichtathletik-Verband (BLV), Hanns-Braun-Strasse / Turnhaus, 14053 Berlin
- 3 World Athletics (WA), 6-8, Quai Antoine 1er, BP 359, MC 98007 Monaco
- 4 Deutscher Rollsport und Inline-Verband e.V. (DRIV e.V.), Otto-Fleck-Schneise 10a, 60528 Frankfurt
- 5 Abbott World Marathon Majors Ltd. (USA) (AWMM), 21660 W Field Parkway, Deer Park IL 60010, USA
- 6 Nationale Anti Doping Agentur (NADA), Heussallee 38, 53115 Bonn
- 7 World Anti-Doping Agency (WADA), Stock Exchange Tower 800 Place Victoria, Montreal (Quebec) H4Z 1B7 Canada

In accordance with the current rules of the associations, personal data (especially result lists) are processed for the recognition and listing of records by these associations. Further information can be found in the respective association rules. These are available at: <https://www.scc-events.com/agb/verbandsregeln>

* The “digital shoecounting” project is managed under the data protection responsibility of adidas AG, Adi-Dassler-Str. 1, 91073 Herzogenaurach. Further information about the “shoecounting” can be found in the data protection information of adidas, available at: <https://www.scc-events.com/en/privacy-information>

4. Duration of data storage

We process your data in order to carry out the registration and drawing and then for your participation in the sports event for the duration of the contract and the resulting storage obligations.

The storage period for all processing activities in connection with the online booking portal is described in the data protection information regarding the user account, available at:

<https://www.scc-events.com/en/privacy-information>

Registration data of the non-winners of the race entry drawing will be deleted after the draw. If consent for contact has been given, this relates exclusively to the use of contact data (name, first name, account ID, email address) for information on available race entries for the BMW BERLIN-MARATHON. The data will be deleted upon revocation of consent or one week after the event at the latest.

PAPS keys will be deleted one year after their creation.

Documents to verify proof of age (upload option for guaranteed race entry bookings) will be deleted after two months.

Competition data that are part of the reporting and documentation of the public, international competition will not be deleted (this concerns the recognition and listing of records, media reporting, the provision of digital certificates, as well as the final result lists with the following data of the participants: surname, first name, start number, nationality, placement, club, year, gender, age group, result times). The right to object remains unaffected. Please note that within the scope of archiving for journalistic or statistical purposes, result lists or records may be stored worldwide even beyond the periods specified here (Art. 85 and Art. 89 GDPR).

After the publication of competition data on the websites of SCC or supervising sports associations, the data can be accessed worldwide on the Internet. Further distribution or indexing by search engines or copies by third parties are thus possible. A deletion of these data cannot be guaranteed continuously.

The data and information on issued starting bans and rule violations will be deleted when the starting ban has been lifted or the rule violation is not subject to any further sanctions. Emergency contact data will be deleted 4 weeks after the end of the event.

Log and protocol data will be deleted as soon as they are no longer needed, at the latest 3 months after retrieval of our online offers (websites, online booking portal). Further information can be found in the data protection declarations of the respective websites. The privacy policy of the online booking portal is available at <https://login.scc-events.com/s/data-protection>.

The storage period for created and published photo and video recordings is described in the privacy policy "Photo and Video", available at: <https://www.scc-events.com/en/privacy-information>

We store data that are processed on the basis of consent until revocation or until the respective purpose is fulfilled. Corresponding information can be found in the respective declaration of consent. The revocation of a consent does not affect the legality of the data processed until the revocation.

We store our responses to the data protection inquiries regarding information, correction, deletion or restriction of processing, as well as other inquiries from data subjects or supervisory authorities regarding data protection issues for the purpose of accountability for three years.

5. Rights of data subjects

All data subjects have the right of access in accordance with Art. 15 GDPR, the right to obtain rectification of their inaccurately stored data in accordance with Art. 16 GDPR, the right to obtain the erasure of personal data in accordance with Art. 17 GDPR, the right to obtain the restriction of processing of their data in

accordance with Art. 18 GDPR and the right to receive their personal data in accordance with Art. 20 GDPR. Consent granted may be revoked at any time. The revocation of a consent does not affect the lawfulness of the processing until the revocation.

Right to object:

According to Article 21 GDPR, data subjects also have the right to object at any time to the processing of personal data concerning them.

A) Right of objection in individual cases according to Art. 21 (1) GDPR

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you, which is carried out on the basis of Art. 6 (1) lit f) GDPR (data processing based on a balancing of interests). If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing which outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

B) Right to object to the processing of data for the purposes of direct marketing in accordance with Art. 21 (2) GDPR

In individual cases, we process your personal data for the purpose of direct advertising (by post and e-mail). You have the right to object at any time to the processing of your personal data for the purpose of such advertising. If you object to the processing for direct marketing purposes, we will no longer process your personal data for these purposes.

Please send any requests to exercise your rights as a data subject, stating your full name, by post or e-mail to our data protection officers: SCC EVENTS GmbH, Data Protection Officer, Olympiapark Berlin, Hanns-Braun-Strasse / Adlerplatz, 14053 Berlin or datenschutz@scc-events.com

Right of appeal:

If you suspect that we are processing your data unlawfully, you can of course obtain a judicial clarification of the problem at any time. In addition, every other legal option is open to you. Irrespective of this, you have the option of contacting a supervisory authority in accordance with Art. 77 (1) GDPR. The right of appeal according to Art. 77 GDPR is available to you in the EU member state of your place of residence, your place of work and/or the place of the alleged infringement, i.e. you can choose the supervisory authority to which you turn from the above-mentioned places. The supervisory authority to which the complaint has been submitted will then inform you of the status and results of your submission, including the possibility of a judicial remedy in accordance with Art. 78 GDPR.

Note on publication:

We would like to point out that in particular the data in the results lists and media coverage are only partially the responsibility of SCC EVENTS GmbH. In particular, printed products such as daily newspapers or live broadcasts via radio and television are subject to reporting in the public interest due to the competitive character of this sporting event, so that the rights of individual affected persons do not fundamentally prevail. Therefore, please contact us directly if you have any questions or requests regarding these topics: Revocation of a consent or objection to data processing in the case of publication of names, images or result lists on the websites and social media appearances of SCC, on video platforms, on websites and social media channels of other operators (sponsors, associations, photo and video service providers), in the press or in media reports.

Please note that in the context of archiving for journalistic or statistical purposes, result lists or records may be stored worldwide beyond these specified periods (Art. 85 and Art. 89 GDPR).

After the publication of personal data, the data can be accessed worldwide on the Internet. Further distribution or indexing by search engines or copying by third parties is possible. A deletion of these data cannot be guaranteed continuously.

In general, when publishing personal data on the Internet (regardless of the platform selected), it cannot be ruled out that the data may also be accessed from countries that do not have an adequate level of data protection. A permitted publication of personal data on the Internet does not constitute a transfer of personal data to a third country in this sense.

6. Transfer of data to a third country or international organisation

We sometimes transfer personal data to third countries or to international organisations. A list of these services and service providers that may be used in connection with booking and participation in the above-mentioned sporting event is provided below in this document.

Third countries are those countries outside the EEA where the GDPR is not directly applicable. The level of data protection is not comparable with that in the EU. To compensate for the existing data protection deficit in the absence of an adequacy decision, we have agreed further suitable guarantees for the processing of personal data with the service providers concerned in the third country or with the international organisation in addition to the standard data protection clauses, so that the data protection standards for these data transfers are compatible with the legal data protection provisions of the EU and adequate protection is ensured when processing personal data.

Company name and address	Processor or joint controller, activities/purpose of the transfer	Legal basis for the transfer of data to a third country or international organisation
Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland	Joint responsibility, operation of the social media platform Twitter	International organisation, standard data protection clauses EU Controller-to-Controller https://gdpr.twitter.com/en/controller-to-controller-transfers.html
Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland	Joint responsibility, operation of the social media platforms Facebook and Instagram	International organisation, standard data protection clauses EU Controller-to-Controller https://www.facebook.com/legal/EU_data_transfer_addendum/update
Vimeo Inc., 555 West 18th Street, New York, 10011, USA	Own responsibility, operation of the Vimeo video platform	Headquarters in a third country, https://vimeo.com/privacy
Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland	Order processor, operation of the video platform YouTube	International organisation, standard data protection clauses EU Controller-to-Processor, https://www.youtube.com/t/terms_dataprocessing und https://business.safety.google/adsprocessorterms/sccs/eu-c2p/
World Athletics (WA), 6-8, Quai Antoine 1er, BP 359, MC 98007 Monaco	Their responsibility, listing of records, association rules according to rulebook, available	Internationale organisation, contract performance according to rules and regulations

	at: https://www.worldathletics.org/world-ranking-rules/basics	
Abbott World Marathon Majors Ltd. (USA), AWMM, 21660 W Field Parkway, Deer Park IL 60010, USA	Their responsibility, listing of records, conditions of participation available at: https://www.worldmarathonmajors.com/terms-of-use and privacy policy available at: https://www.worldmarathonmajors.com/privacy-policy	International organisation, consent to data transfer in accordance with § 11 Conditions of Participation https://login.scc-events.com/s/terms-participation?language=de
World Anti-Doping Agency (WADA), 800 Place Victoria, Montreal (quebec) H4Z 1B7 Canada	Their responsibility. doping controls in accordance with the “World Anti-Doping Code” available at: https://www.nada.de/fileadmin/-DOWNLOADS-/Regelwerke/Athlete Reference Guide to 2015 Code.pdf	International organisation, adequacy decision of the EU Commission, available at: https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A02002D0002-20161217 ., contract performance by rulebook
Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland / Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA	Order processors, IT infrastructure	International organisation, standard data protection clauses EU Controller-to-Processor: https://cloud.google.com/terms/sccs/eu-c2p
Salesforce.com Germany GmbH / Salesforce.com, inc., Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA	Order processor, user account management and online booking portal	International organisation, standard data protection clauses EU Controller-to-Processor https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf
Marathon-Photos.com Ltd., PO Box 60, 170 Collingwood Street, Hamilton 3240, New Zealand	Joint responsibility, exclusive video service provider	Headquarters in a third country, adequacy decision of the EU Commission, available at https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32013D0065 und Art.-26-Vertrag and Art. 26 Contract

7. Voluntary nature and obligation to provide personal data

Registration for the drawing and participation in the sports event is always voluntary. In the case of participation, the data required for the organisation and realisation of the sports event in accordance with the terms of participation and contractually stipulated must be provided. Failure to provide the data will result in the inability to participate in the drawing and the sporting event. The terms of participation for our sports event are available at: <https://login.scc-events.com/s/terms-participation>.

Prerequisite for the registration to our sports event is the existence of an active user account in our online booking portal <https://login.scc-events.com/s/> according to the General Terms and Conditions (GTC) <https://login.scc-events.com/s/terms-conditions>. Processing activities in connection with the online booking portal are described in the data protection information for the user account, available at: <https://www.scc-events.com/en/privacy-information>.

If requested information is voluntary, we have marked this information in the respective survey form and in the terms of participation. You can revoke the processing of personal data on the basis of consent at any time for the future.

8. Automated decision making, profiling

Automated decision-making in the sense of Art. 22 DSGVO is not carried out.

“Profiling” is a form of automated processing of personal data using the assessment of personal aspects relating to a natural person, in particular for the purpose of analysing or predicting the performance of work, economic situation, health, personal preferences or interests, reliability or conduct, whereabouts or change of location of the data subject, where this produces legal effects concerning the data subject or significantly affects him/her in a similar way. Your data will not be processed by SCC EVENTS GmbH for the purpose of profiling.