

## PRIVACY POLICY

Version: February 2026

Below we inform you which data we collect from you and how we process and store this data. Please note that data transmission over the internet (e.g. when communicating by email) may have security vulnerabilities. Complete protection of data against access by third parties is not possible.

### I. Name and contact details of the controller

This privacy information applies to data processing by:

Peden Bloodstock GmbH

Leyenburg, 47509 Rheurdt, Germany

Tel: +49 208 378 2412 Fax: +49 208 378 1415

Email: [transport@peden.de](mailto:transport@peden.de)

Managing Director: Martin Atock

Commercial Register No. HRB 4630, District Court (Amtsgericht) Kleve

### II. Nature of the processing of personal data and purposes of use

For the sake of clarity, we have first divided the information on data collection and data processing according to how contact with you is established—whether via our website, via Facebook or otherwise (e.g. by telephone or at a trade fair). We also explain data processing in relation to you as our business partner or as an applicant for an employment relationship. Please do not hesitate to contact us if you have any questions.

#### 1. Visiting the website

##### *a) Accessing the website*

When you access our website [www.pedenbloodstock.com](http://www.pedenbloodstock.com), information is automatically sent to the server of our website by the browser used on your device. This information is temporarily stored in a so-called log file. The following information is collected without any action on your part and stored until it is automatically deleted:

- IP address of the requesting computer,
- date and time of access,
- name and URL of the retrieved file,
- website from which access is made (referrer URL),
- browser used and, where applicable, your computer's operating system, as well as the name of your access provider.

We process the above data for the following purposes:

- to ensure that the website connection is established smoothly,

- to ensure convenient use of our website,
- to evaluate system security and stability.

The legal basis for this data processing is Article 6(1)(f) GDPR. Our legitimate interest follows from the purposes of data collection listed above. In this context, we do not use the data collected to draw conclusions about your identity.

In addition, we use cookies when you visit our website. Further explanations can be found below under (c).

#### *b) Using our contact form for a consultation enquiry*

On our website we offer you the option of contacting us via a form provided there for the purpose of a personal consultation. Providing your name and a valid email address or your telephone number (depending on how you wish to be contacted) is required so that we know who the enquiry is from and can respond in line with your wishes.

Any other information helps us to address your enquiry more precisely in advance, but it is not mandatory. It is entirely your choice whether you wish to enter this data in the contact form.

The processing of your telephone number for the purpose of contacting you is carried out pursuant to Article 6(1)(a) GDPR on the basis of your consent.

The processing by us of the information you enter is carried out pursuant to Article 6(1)(b) GDPR on the basis of fulfilling your enquiry.

#### *c) Cookies*

We use cookies on our website. Cookies are small data files which your browser automatically creates and which may be stored on your device (laptop, tablet, smartphone, etc.) in a text file when you visit our site. Cookies do not cause any damage to your device and do not contain viruses, Trojans or other malware.

Cookies store information that arises in connection with the specific device used. However, this does not mean that we thereby obtain immediate knowledge of your identity.

#### Technically necessary cookies

We use so-called session cookies to recognise that you have already visited individual pages of our website. These are automatically deleted when you leave our site. These technically necessary cookies are essential for operating our website and are therefore set without your consent. The legal basis is Section 25(2) no. 2 TDDDG in conjunction with Article 6(1)(f) GDPR.

#### Non-essential cookies

If we use cookies that are not strictly necessary, we obtain your explicit consent in advance (opt-in). The legal basis for using such cookies is Section 25(1) TDDDG in conjunction with Article 6(1)(a) GDPR. You may withdraw your consent at any time with effect for the future.

Most browsers accept cookies automatically. You can, however, configure your browser so that no cookies are stored on your computer or so that a notice always appears before a new cookie is created. Completely disabling cookies may mean that you cannot use all functions of our website.

#### ***d) Analytics / tracking tools***

We do not use any tracking tools on our website.

#### ***e) Links to third-party websites***

We use links on our website to third-party websites. If you click such a link, your data may be transferred to those third parties. We cannot control the data processing that takes place there and are therefore not responsible for it. We recommend that, when leaving our website, you inform yourself about the privacy practices of the other website you visit.

## **2. Facebook Page**

We have set up a Facebook Page at <https://www.facebook.com/Peden-Bloodstock-International-Horse-Transport-Logistics-146939758699509/>.

With this page we inform you about news relating to our service offering. You can publish posts on our Page and click “Like” to stay up to date. Depending on how you have configured your privacy settings, we may be able to see that you have liked our Page.

#### ***a) Visiting via our website***

When visiting our website, you can reach our Facebook Page via the Facebook button provided there. The Facebook button is set up as a link, so that only when you activate the link will the data collected when you access our website (see above under II.1.a) be passed on to Facebook.

#### ***b) Visiting directly via Facebook***

You can also access our Page directly via Facebook without using our website.

#### ***c) Joint controllership and data processing on Facebook***

Joint controllership pursuant to Article 26 GDPR

We operate our Facebook Page jointly with Meta Platforms Ireland Limited (formerly Facebook Ireland Ltd.), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, as joint controllers within the meaning of Article 26 GDPR. Joint controllership is limited to the collection and transmission of data to Meta. The agreement on joint controllership (“Page Controller Addendum”) is available at:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

Allocation of responsibilities:

Meta is responsible for providing the technical platform, processing users' data for its own purposes (advertising, profiling) and complying with data subject rights in respect of the data stored by Meta.

We are responsible for the decision to operate a Facebook Page and for the content we publish there.

#### Processing by Meta

As the platform operator, Meta processes personal data of its users and visitors, creates statistics and, where applicable, user profiles, and uses the data for advertising purposes. The data may also be used for market and opinion research. Your information is collected via cookies and this may be facilitated by you being logged in to the platform.

We do not process the data you enter on Facebook outside the Facebook Page.

The processing described above is based on our legitimate interests pursuant to Article 6(1)(f) GDPR, to provide you with the best possible information about our service and to comprehensively shape our company's external presence.

#### Exercise of data subject rights

In the case of requests for information and the exercise of user rights, we point out that these can be asserted most effectively with Meta. Only Meta has access to users' data and can take appropriate measures directly and provide information. However, you can also send your request to us and we will forward it to Meta. If you need further assistance, please feel free to contact us.

Further information on Meta's processing of data can be found at:

<https://www.facebook.com/about/privacy/>

Opt-out options are available at: <https://www.facebook.com/settings?tab=ads> and <http://www.youronlinechoices.com>

### **3. Other contact (e.g. telephone, email, event) and placing orders**

If you contact us by email, by telephone or otherwise in person, we generally collect your first and last name, your address and any other data necessary in connection with the contact and/or placing of an order. Depending on what is required, this may include in particular:

- telephone number
- fax number
- email address
- personal passport number / copy of identity card or passport
- copy of visa
- delivery address
- payment information

- other contract data
- as well as other contact details you voluntarily provide to us.

Depending on the content of the enquiry, the legal basis for processing is Article 6(1)(b) GDPR (fulfilment of your enquiry) or Article 6(1)(f) GDPR based on our legitimate interests. Our legitimate interest lies primarily in being able to contact you as quickly as possible.

In addition, the data is used for statistical purposes and for direct advertising. The legal basis for this processing is Article 6(1)(f) GDPR, as we have a legitimate interest in statistical analysis to optimise our offering and in promoting our service offering.

#### **4. Data relating to contact persons of our business partners**

We may store the contact details (surname, first name, address, telephone number, email address, company affiliation) of contact persons at our business partners for the purpose of preparing, concluding and performing contracts. The legal basis for processing is Article 6(1)(f) GDPR. Our legitimate interest follows from the purpose of preparing, concluding and performing contracts.

#### **5. Data protection for applications and in the recruitment process**

In the context of applications, we collect and process applicants' personal data for the purpose of handling the recruitment process. The legal basis for processing is Article 88 GDPR in conjunction with Section 26 of the German Federal Data Protection Act (Bundesdatenschutzgesetz). Processing may also take place electronically. This is the case in particular if an applicant submits application documents electronically, for example by email or via a contact form on the website. If we conclude a contract with an applicant, the data transmitted will be stored for the purpose of handling the contractual relationship in compliance with statutory provisions. The legal basis for this is Article 6(1)(b) GDPR.

### **III. Storage period**

Data is deleted as soon as it is no longer necessary for the purpose for which it is processed. In detail:

Website visit without using the contact form: your data is deleted after one month.

Contact form or other enquiry: the personal data we collect via the contact form (see above II.1.b) or in connection with another enquiry (see above II.3) is deleted after your enquiry has been dealt with and, if no contract is concluded, is automatically deleted at the latest after 24 months.

Order processing: the personal data collected by us for processing your order is stored until the expiry of the statutory retention periods and then deleted, unless we are required to store it for longer pursuant to Article 6(1)(c) GDPR due to tax and commercial law retention and documentation obligations (under the German Commercial Code (HGB) or the German Fiscal Code (AO)), or you have consented to storage beyond this pursuant to Article 6(1)(a) GDPR.

Applicant data: data relating to persons who have applied to us for employment is deleted 3 months after completion of the recruitment process if no contract is concluded with the applicant. This applies only insofar as there are no other legitimate interests on our part opposing deletion. Other legitimate interest in this sense includes, for example, a duty to provide evidence in proceedings under the German General Equal Treatment Act (AGG).

## IV. Disclosure of data

### 1. Authorisation to disclose

We do not transfer your personal data to third parties for purposes other than those listed below.

We disclose your personal data to third parties only if:

- this is legally permissible and required under Article 6(1)(b) GDPR for the performance of contractual relationships with you,
- there is a legal obligation to disclose under Article 6(1)(c) GDPR, and/or
- disclosure is necessary under Article 6(1)(f) GDPR for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding legitimate interest in the non-disclosure of your data.

For other purposes, we disclose your personal data only if you have given your explicit consent, Article 6(1)(a) GDPR.

### 2. Recipients

We disclose your personal data primarily to service partners involved in performing the contract, in particular:

- road transport companies
- airlines
- other forwarding/logistics service providers
- customs agents
- credit institutions and credit card companies

In addition, under certain conditions we transfer your data to organising committees and official bodies/government authorities. We also transfer your contract data to our tax adviser and the relevant authorities (in particular the tax authority).

Furthermore, the transfer of your data to the following third parties may be considered within the scope of legally permissible disclosure: processors to whom we transmit personal data in order to conduct the business relationship with you, or to whom we permit access to the data stored by us. In particular: support/maintenance of IT applications; archiving; call-centre services; controlling; data destruction; debt collection; customer management; marketing; website management.

In cases where we transfer your personal data to third parties, the scope of data transferred is limited to the minimum required.

Disclosure of the data is necessary in the context of initiating and/or performing the contract and is therefore justified under Article 6(1)(b) GDPR.

### **3. Transfer of data to third countries**

Note:

As an internationally active horse transport company, we transfer your personal data worldwide to recipients in third countries (i.e. outside the European Union (EU) or the European Economic Area (EEA)) in the context of performing the contract.

A transfer takes place only if:

- it is necessary for the performance of our (pre-)contractual obligations (Article 49(1)(b) GDPR),
- you have given your explicit consent (Article 49(1)(a) GDPR),
- there is a legal obligation, or
- this is done on the basis of our legitimate interests.

Safeguards for data transfers:

Where possible, we ensure that transfers are carried out in accordance with Articles 44 et seq. GDPR. This can be ensured in particular through the following mechanisms:

- Adequacy decision of the European Commission (Article 45 GDPR): for some countries the European Commission has determined an adequate level of data protection. For the USA, the EU-US Data Privacy Framework has applied to certified companies since July 2023.
- Standard Contractual Clauses (Article 46(2)(c) GDPR): where there is no adequacy decision, we use the Standard Contractual Clauses approved by the European Commission.
- Derogations for specific cases (Article 49 GDPR): in individual cases, transfers may be based on your explicit consent or on what is necessary for performing a contract with you.

Risk notice:

Please note that in some third countries there may be no level of data protection comparable to European law. In particular, authorities there may have access rights without comparable legal remedies being available to you. By commissioning our services that include a transport to such a third country, you consent to the associated transfer of data.

### **V. Data subject rights**

You have the following rights regarding the processing of your personal data:

## 1. General rights

You have the right to:

**Access (Article 15 GDPR):** you may request, free of charge, information about the personal data we process about you. In particular, you may request information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data (if it was not collected from you), and the existence of automated decision-making including profiling and, where applicable, meaningful information about the logic involved.

**Rectification (Article 16 GDPR):** you may request without undue delay the rectification of inaccurate personal data or completion of your personal data stored by us.

**Erasure (Article 17 GDPR):** you may request the erasure of your personal data stored by us, unless processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of legal claims.

**Restriction of processing (Article 18 GDPR):** you may request the restriction of processing of your personal data if you contest the accuracy of the data, the processing is unlawful but you oppose erasure, we no longer need the data but you require it for the establishment, exercise or defence of legal claims, or you have objected to processing pursuant to Article 21 GDPR.

**Data portability (Article 20 GDPR):** you may receive your personal data that you have provided to us in a structured, commonly used and machine-readable format, or request transmission to another controller.

**Withdrawal of consent (Article 7(3) GDPR):** you may withdraw any consent you have given us at any time. This means that we may no longer continue data processing based on this consent for the future.

**Right to lodge a complaint with a supervisory authority (Article 77 GDPR):** you may lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace, or of our company's registered office.

Supervisory authority responsible for us:

State Commissioner for Data Protection and Freedom of Information North  
Rhine-Westphalia  
P.O. Box 20 04 44  
40102 Düsseldorf  
Tel.: +49 211 38424-0 Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)  
Website: <https://www.ldi.nrw.de>

## **2. Right to object**

Special notice pursuant to Article 21 GDPR:

You have the right, on grounds relating to your particular situation, to object at any time to the processing of personal data concerning you that is carried out on the basis of Article 6(1)(f) GDPR (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 the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Where we process your personal data for direct advertising, you have the right to object at any time. If you object to processing for direct advertising purposes, we will no longer process your personal data for these purposes.

If you wish to exercise your right of withdrawal or objection, simply send an email to [privacypolicy@peden.de](mailto:privacypolicy@peden.de).

## **VI. Data security**

During website visits we use the widely used SSL (Secure Socket Layer) procedure in conjunction with the highest level of encryption supported by your browser. This is usually 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead.

You can recognise an encrypted connection by the fact that the browser's address line changes from "http://" to "https://" and by the padlock symbol in your browser line.

If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

We also use suitable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

## **VII. Currency and changes to this Privacy Policy**

This Privacy Policy is currently valid and is dated February 2026.

Due to the further development of our website and the offers made thereon, or due to changes in legal or regulatory requirements, it may be necessary to amend this Privacy Policy. The current version of this Privacy Policy can be accessed and printed at any time on the website at <https://www.pedenbloodstock.com/datenschutz>.