Privacy Policy for Reporting Vulnerabilities or Information Security Incidents

Version 1, dated 08.01.2026

Controller

The following entities are jointly responsible for data processing:

ÖBB-Business Competence Center GmbH
Lassallestraße 5
1020 Vienna

ÖBB-Infrastruktur Aktiengesellschaft
Praterstern 3
1020 Vienna

Contact

Each company within the ÖBB Group has appointed a Data Protection Officer. An overview can be found here: https://konzern.oebb.at/de/impressum/datenschutzbeauftragte

For general inquiries, the Group Data Protection Officer can be contacted at:
datenschutz.konzern@oebb.at

Description of Processing Activities and Purposes of Processing Personal Data

The purpose of processing is to increase the Group's resilience in relation to information security by appropriately handling incoming reports of vulnerabilities or information security incidents through the provision of an external reporting channel, as well as by analysing and handling these reports.

Legal Basis for Processing

The legal bases for processing are:

- **Article 6(1)(c) GDPR**, i.e., the legal obligation arising from the NISG 2026 to establish reporting channels for reporting legal violations and to document, analyze, and handle incoming reports.

- **Article 6(1)(f) GDPR**, i.e., the legitimate interests of the controllers in appropriately handling reports of vulnerabilities or security incidents.

Automated Decision-Making, Including Profiling

No decision that produces legal effects concerning you or similarly significantly affects you is made solely by automated means.

Transfer of Personal Data to Other Recipients and Third Parties
Personal data is only transferred to entities within the European Economic Area that are subject to EU data protection law or are obliged to maintain an equivalent level of protection, or where such protection has been confirmed by an adequacy decision of the European Commission. We currently do not transfer data to other third countries, nor is such transfer planned.

a) Transfer within affiliated companies pursuant to Article 6(1)(f) GDPR
Personal data is transferred to affiliated companies to the extent necessary for handling vulnerabilities or information security incidents.
b) Transfer to third parties pursuant to Article 6(1)(c) and (f) GDPR
Personal data is transferred to third parties such as authorities or courts, if we are legally obliged to do so (reporting obligations under NISG 2026) or based on official or judicial orders, or if we are entitled to do so, e.g., for the prosecution of criminal offenses or for asserting and enforcing our rights and claims.
c) Transfer to processors
We reserve the right to transfer personal data to processors, particularly for the purpose of further analysis of incidents.

Duration of Storage and Routine Deletion of Personal Data

We process and store personal data for the period necessary to fulfill the purpose of storage or as required by retention obligations. After the purpose ceases to exist or is fulfilled, or after withdrawal of your consent or objection to processing, your personal data will be deleted or blocked unless compelling reasons prevent this. Deletion will occur if binding retention periods no longer apply and deletion does not cause disproportionate effort due to the specific nature of storage, and the data is no longer needed for exercising or defending legal claims.

Rights of Data Subjects

You have the following rights regarding your personal data: the right to access data stored about you, the right to rectify your data, the right to erase your data, the right to restrict processing, and the right to data portability. This generally also applies to further processing based on overriding legitimate interests. However, in certain cases, compelling legitimate grounds on our part may justify continued processing or processing may be necessary for the establishment, exercise, or defense of legal claims.

You also have the right to contact the Data Protection Authority as the competent supervisory authority:
Austrian Data Protection Authority
Barichgasse 40–42
1030 Vienna
dsb@dsb.gv.at

Changes to the Privacy Notice
To ensure that our privacy notice always complies with current legal requirements, we reserve the right to make changes at any time. This also applies if the privacy notice needs to be adapted due to new or revised services or offerings.