

# Data privacy notices pursuant to the EU General Data Protection Regulation for Business Partners and Interested Parties and their Contacts

The information below is intended to give you an overview of how we process your personal data and your rights under the data protection law. Which data are specifically processed depends mainly on the type and scope of the existing business relationship.

Please relay this information to current and future persons authorized to represent your company and to contact persons in your company.

## 1. Who is responsible for processing your personal data and who can you contact?

The Controller (partly responsible) for processing of personal data is:

Mannesmannröhren-Werk GmbH  
Mannesmannstr. 11  
01619 Zeithain  
Telefon: +49 3525 79-2202

You can contact our **Data Protection Officer** by email: [datenschutz.mptde@mannesmann.com](mailto:datenschutz.mptde@mannesmann.com)

## 2. What data do we use and how do we collect it?

As part of informing about our business development and the initiating and conducting of business relations, we process the following data categories of our business partners and their contacts in particular. We obtain this data directly from these partners or from other Salzgitter Group companies or from other parties within the scope permissible (e.g. for the performance of contracts or based on consent granted). Furthermore, data that we have obtained from sources in the public domain (e.g. commercial registers, press, Internet) within the scope permissible is also processed:

Interested parties	<ul style="list-style-type: none"> <li>Personal/contact data (e.g. first name, surname, company name, address, (mobile) telephone number, telefax number, email)</li> <li>Communication data in connection with correspondence (emails, letters)</li> </ul>
Customers, suppliers, service providers	<ul style="list-style-type: none"> <li>Personal/contact data (e.g. first name, surname, company name, address, (mobile) telephone number, telefax number, email, license plate in case of access to our factory area by car)</li> <li>Contractual and billing data (e.g. bank details, goods ordered, data of invoice)</li> <li>Communication data in connection with correspondence (emails, letters)</li> </ul>

Supervisory board members, general managers and other contact persons of subsidiaries and associates of the Salzgitter Group	<ul style="list-style-type: none"> <li>Personal/contact data (e.g. first name, surname, company name, address, (mobile) telephone number, telefax number, email, license plate in case of access to our factory area by car)</li> <li>Communication data in connection with correspondence (emails, letters)</li> <li>Participation in events held internally by the Group</li> </ul>
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## 3. For what purposes and on what legal basis is your data processed?

The object of our company is the production and sale of precision steel tubes and tube products as well as all related technical and commercial services. Personal Data is processed for the purpose of performing these tasks pursuant to the provisions defined under the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG) as well as all other pertinent laws (e.g. German Commercial Code – HGB), German Fiscal Code (Abgabenordnung – AO) etc.).

### a. For the performance of a contract or for pre-contractual measures (Art. 6 (1b) GDPR)

Personal data are processed for the purpose of performing contracts with our customers, suppliers and service providers. This also includes the performance of pre-contractual measures upon request by the business partner.

### b. In the context of the balancing of interests (Art. 6 (1f) GDPR)

If necessary, we process your data beyond the actual performance of the contract with a view to safeguarding the justifiable interests of ourselves or of third parties.

Examples:

- For the reviewing and optimization of processes for analyzing requirements and for addressing the customer directly
- For advertising purposes and marketing/opinion research provided that you have not objected to the use of your data
- Assertion of legal claims and defense in litigation
- For ensuring IT security and IT operations
- For the prevention of crime
- For the protection of property, anti-theft system (video)
- For access control (Buildings and equipment)

### c. On the basis of consent (Art. 6 (1 a) GDPR)

If you have given us your consent to the processing of personal data for certain purposes (e.g. Newsletters), this processing complies with the requirement of lawfulness. Consent once granted can be revoked at any time with effect for the future. This also applies to the revocation of declarations of consent that we were granted before the GDPR took effect, i.e. before May 25, 2018. Please note that any revocation applies just to

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the future. Processing that took place before the revocation remains unaffected.

## d. Based on statutory requirements (Art. 6 (1 c) GDPR) or in the public interest (Art. 6 (1 e) GDPR)

Moreover, we are subject to various legal obligations, i.e. statutory requirements, e.g. tax regulations.

## 4. Who is your data given to?

The departments in our company that require your data for the purpose of fulfilling our contractual and legal obligations and for the aforementioned purposes are provided with your data. Service providers and agents used by us may be given data for this purpose

Data is only relayed outside the company if this is required by statutory provisions or if you have given your consent.

In turn, all recipients are themselves obligated to comply with data protection.

Assuming these preconditions, recipients of personal data may be the following:

- Public bodies and institutions (e.g. tax authorities) on the grounds of a statutory or official obligation
- Processors to whom we relay personal data for the purpose of conducting the business relationship with you (e.g. support/maintenance of IT systems, data destruction, payments, bookkeeping)
- Units with regard to which you have given us your consent for data transfer
- those subsidiaries or service providers involved in the performance of the contract

No data is transferred to recipients in countries outside the EU or the EEA (so-called non-Member States). If, in the individual case, data is to be transferred to non-Member States, this is either necessary for performing a contract, takes place in the context of processing a contract, is mandatory under the law or is based on consent that you have granted to us. If service providers in a non-Member State are used, an appropriate level of data protection is guaranteed.

## 5. How long will your data be stored?

We process and store your personal data only as long as it is required for the fulfillment of the purposes cited under Item 3. It should be noted here that many of our business relationships are long term. If the data is no longer required for the performance of contractual or statutory obligations, it will regularly be erased unless this data is necessary for further temporary processing for the following purposes:

- Compliance with the retention periods under commercial and fiscal law, e.g. German Commercial Code or Fiscal Code that define the periods of retention as two to ten years.
- Preservation of proof in the context of the statute of limitations (e.g. Sections 195 et seq. German Civil Code (BGB)).

## 6. What are your data protection rights?

All persons affected (data subjects) have the right to **information** pursuant to Art. 15 GDPR, the right to **rectification** pursuant to Art. 16 GDPR, the right to **erasure** pursuant to Art. 17 GDPR, the right to **restriction on the processing** pursuant to Art. 18 GDPR, the right to **objection** based on Art. 21 GDPR and the right to **data portability** pursuant to Art. 20 GDPR. The restrictions under Sections 34 and 35 of the German Federal Data Protection Act apply to the right to information and the right to erasure. Moreover, there is a right to lodge a complaint with the competent data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 of the German Federal Data Protection Act).

You can revoke any consent granted for the processing of personal data at any time. This also applies to the revocation of declarations of consent that we were granted before the GDPR took effect, i.e. before May 25, 2018. Please note that any revocation applies just to the future. Processing that took place before the revocation remains unaffected.

The revocation must be sent in writing by letter to the data protection officer or free of form per email to [datenschutz.mptde@mannesmann.com](mailto:datenschutz.mptde@mannesmann.com) (Art. 7 GDPR).

## 7. Is there any obligation for you to provide personal data?

Within the scope of our business relationship, you must provide personal data required for the initiation and conducting of a business relationship and compliance with the associated contractual obligations, or data which we are required to collect under the law.

## 8. Is there automatic decision-making (including profiling)?

No use is made of automatic decision-making or profiling.