

DATA PROTECTION NOTICE

Who is responsible for data processing and who is the data protection officer?

The body responsible for data processing is

Aktien-Gesellschaft der Dillinger Hüttenwerke
Werkstr. 1
66763 Dillingen, Germany
Phone: +49 6831 47 0
Fax: +49 6831 47 2212
E-mail address: info@dillinger.biz

The **Group Data Protection Officer**, Mr. Uwe Schneider, can be contacted at the above address or at
Phone: +49 (0) 68 31 47- 71 51
Email: uwe.schneider@stahl-holding-saar.de

Which categories of data do we use and where do they come from?

Personal data is collected in the context of our business relationships with our business partners. In addition, we process personal data that we have permissibly received from third parties.

We also process personal data that we have permissibly obtained from publicly accessible sources (e.g. the Internet).

The categories of personal data processed may include in particular:

- contact information such as first and last name, form of address, title, job title, business address, department, hierarchy, business phone number, business mobile number, business fax number and business email address, language;
- data for processing inquiries and orders, as well as for services, such as information necessary to process payment transactions or to prevent fraud, or information on the use of our e-service, including delivery and invoicing;
- data for conducting customer surveys, marketing campaigns, market analysis, exhibitions, conferences or similar activities and events;
- information collected from publicly available sources or information databases; and
- log data resulting from use of the IT systems

For what purposes and on what legal basis is data processed?

We process personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and all other relevant laws.

We process personal data in order to fulfil a contract to which the data subject is a party, or to carry out pre-contractual measures, which are performed at the request of the data subject (Art. 6 [1] [b] GDPR). The primary purpose of data processing is to process the contract. More details regarding the purpose of data processing can be found in the pertinent contractual documents and Terms and Conditions of Business.

If necessary, we also process the data on the basis of Art. 6 (1) (f) GDPR in order to protect the legitimate interests of ourselves or of third parties (e.g. public authorities). This applies in particular to the prevention of criminal acts or, within the Group, for the purposes of Group management, for internal communication and for other administrative purposes.

If we have been given permission to process personal data for specific purposes, the processing is legal on the basis of this permission (Art. 6 [1] [a] GDPR). Consent that has been granted may be revoked at any time. This also applies to the revocation of consent granted to us prior to the validity of the General Data Protection Regulation. However, the revocation is only effective for the future. Processing based on the consent up to revocation is legal.

Moreover, we process personal data when the processing is necessary to fulfil legal obligations (Art. 6 [1] [c] GDPR). In particular, the European anti-terrorism regulations 2580/2001 and 881/2002 require us to compare the data with the EU terrorism blacklist to ensure that no money or other economic resources are made available for terrorist purposes.

We also process personal data for statistical purposes.

Who gets the data?

Within our company, personal data are given only to those persons and offices (e.g. departments) that require the data to fulfil our contractual and legal obligations.

Within our corporate Group, data are transmitted to specific companies if they perform data processing tasks centrally (such as disposal of files) for the affiliated companies in the Group.

In addition, we may transmit personal data to other recipients outside the company if this is necessary to fulfil contractual and legal obligations (e.g. public authorities).

Other recipients of data may be those bodies for which consent for data transmission has been given.

Which data protection rights may data subjects assert?

Data subjects may request **information** about their personal data stored at the above address. They may also, under certain conditions, request the **correction** or **erasure** of their data. Data subjects may also have a **right to restrict processing** of their data, a **right to data portability** and a **right to obtain the data they have provided** in a structured, commonly used and machine-readable format.

Right to object

According to Art. 21 GDPR, data subjects have the right to object to processing of their personal data for direct marketing purposes without giving a reason. If we process data to safeguard legitimate interests, data subjects may object to such processing for reasons arising from their specific situation. We will then no longer process the personal data unless we can prove compelling reasons for the processing that are worthy of protection and which outweigh their interests, rights and freedoms or that the processing serves the assertion, exercise or defense of legal claims.

To whom may data subjects turn?

Data subjects have the option to lodge a complaint with the above-mentioned Group Data Protection Officer or the responsible data protection supervisory authority.

How long is the data stored?

We delete personal data as soon as they are no longer required for the purposes described above. After the end of the business relationship, the personal data will be stored as long as we are legally obliged to do so. This results periodically from legal requirements governing proof and records retention. In addition, personal data may be stored for the period during which claims may be asserted against us (statutory limitation period from three or up to 30 years).

Who is required to make the data available?

Within the scope of the business relationship, business partners must make available the personal data required to establish, execute and terminate the business relationship, to fulfill the associated contractual obligations or which we are legally obliged to collect. Without this information, we will generally not be able to execute the contract.