

## General Data Protection Notice for Business Partners

The protection of personal data of our business partners (such as customers, suppliers, contractors and service providers commissioned by us) is very important to voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter referred to as "we" or "us"). We are obliged to process your personal data in accordance with the relevant legal provisions and take this obligation very seriously. We expect the same from our business partners.

In the course of our business relationship with you, it is essential that we process your personal data (hereinafter referred to as "data") or the data of your employees. In doing so, we comply with the applicable legal provisions for the protection, lawful handling and confidentiality of data as well as data security, in particular the European General Data Protection Regulation ("GDPR") and the applicable national data protection laws.

This data protection notice informs you about the type, scope and purpose of the collection and use of your data and the data of your employees by us as part of our business relationship.

### 1 Who is responsible for data processing?

The controller for the data processing listed below is

**voestalpine BÖHLER Edelstahl GmbH & Co KG**  
Mariazeller Strasse 25, 8605 Kapfenberg, Austria

### 2 What is personal data?

'Personal data' means any information relating to an identified or identifiable natural person (e.g. name, address, e-mail address, company affiliation).

### 3 Processing of data within the scope of the business relationship

#### 3.1 Communication and correspondence with (potential) business partners

Purpose: In the context of communication and correspondence with you as a (potential) business partner, we process your data in order to process enquiries about products, services and projects and to be able to offer appropriate support. However, we also process your data when we obtain information from you about your products or services (e.g. as a supplier, consultancy firm or tradesman).

Data categories: Basic data of the data subject (e.g. name, title, language), professional contact details (e.g. address, e-mail address, telephone number), documentation of appointments and agreements (e.g. telephone logs, file notes, visit reports); correspondence data (e-mails, correspondence, exchange via collaboration platforms), general data on the business relationship (e.g. enquiries about various products)

Legal basis: Art 6 (1) (f) GDPR - legitimate interests: Communication and correspondence in order to process and respond to your business enquiries.

Storage period: We store your data until the purpose has been fulfilled. After fulfilment of the purpose, your data will only be stored if there is a legal obligation to retain it or another significant reason for further storage can be cited. This may be the case, for example, if we need your data to establish, exercise or defend against legal claims.

Categories of recipients: If necessary, your data will be transferred to other voestalpine Group companies ([www.voestalpine.com/standorte](http://www.voestalpine.com/standorte)) in compliance with data protection regulations. In the context of communication and correspondence, your data may also be transferred to processors (IT service providers) depending on the type of contact selected by you.

### 3.2 Initiation, processing and administration of business transactions

Purpose: We process your data for the initiation, processing and administration of business transactions. This includes in particular the processing of orders and their invoicing, the associated (legally required) bookkeeping, invoicing and accounting as well as the delivery of goods and the agreed performance of maintenance activities or other agreed services. We also process your data for the purpose of handling complaints and for our dunning process.

Data categories: Basic data of the data subject (e.g. name, form of address, language), professional contact details (e.g. address, telephone number, fax), organisational assignment (e.g. professional position, power of representation), company data (e.g. company name, company register number, industry, creditworthiness data), general data on the business relationship (e.g. information on the product offered, sales data, billing data, terms of service, processing of complaints), bank data (e.g. bank details, account number, receipt data), contract data (e.g. concluded contracts, draft contracts and offers as well as associated correspondence), tax data (e.g. VAT, other tax numbers), correspondence data (e.g. e-mails, chat histories), documentation of appointments and agreements (e.g. telephone logs, file notes)

#### Legal bases:

- » Art 6 (1) (b) GDPR - performance of contract or to take necessary steps prior to entering into a contract: if the business partner is a natural person.
- » Art 6 (1) (f) GDPR - legitimate interests: if the business partner is not a natural person, we process the data received from employees of the business partner for the purpose of performing the contract with the business partner.
- » Art 6 (1) (c) GDPR – compliance with a legal obligation: such as regulatory requirements and documentation obligations under tax and company law.

Storage period: We store your data until the purpose has been fulfilled. After fulfilment of the purpose, your data will only be stored if there is a legal obligation to retain it or another significant reason for further storage can be cited. This may be the case, for example, if we need your data to establish, exercise or defend legal claims.

Categories of recipients: If necessary, your data will be transferred to other voestalpine Group companies ([www.voestalpine.com/standorte](http://www.voestalpine.com/standorte)) in compliance with data protection regulations. The data collected for this purpose may also be transferred to other business partners (such as shipping and logistics partners for the performance and processing of orders), but also to tax consultants, auditors, credit agencies, state authorities (e.g. tax office) and, in the event of a legal dispute, also to courts, administrative authorities and legal representatives.

### 3.3 Maintaining the business relationship

Purpose: In order to cultivate and maintain the business relationship with you as a business partner, we arrange customer visits with you, carry out customer and supplier surveys, marketing campaigns, prize draws, competitions and similar activities and events from time to time and also offer you further training and special training courses for business partners. For this purpose, we process your data beyond the actual performance of the contract in a customer/supplier management system or in a comparable IT system or one that serves this purpose.

Data categories: Basic data of the data subject (e.g. name, title, language), professional contact details (e.g. address, telephone number, fax), organisational assignment (e.g. professional position, power of representation), company data (company name, company register number, industry), general data on the business relationship (e.g. information on the product offered, sales data, purchasing power classification, purchasing behaviour and demand interests, participation in marketing campaigns), correspondence data (e.g. e-mail content, comments on portals, responses to written customer and supplier surveys), documentation of appointments and agreements (e.g. visit reports, responses to telephone surveys), training data (e.g. certificates, training content)

Legal bases:

- » Art 6 (1) (a) GDPR - Consent: Participation in prize draws, training courses, customer and supplier surveys
- » Art 6 (1) (f) GDPR - legitimate interests: Management of a customer/supplier management system to maintain and cultivate the business relationship; processing of your feedback regarding our business relationship

Storage period: We store your data until the purpose has been fulfilled. After fulfilment of the purpose, your data will only be stored if there is a legal obligation to retain it or another significant reason for further storage can be cited. This may be the case, for example, if we need your data to establish, exercise, defend legal claims.

Categories of recipients: If necessary, your data will be transferred to other voestalpine Group companies ([www.voestalpine.com/standorte](http://www.voestalpine.com/standorte)) in compliance with data protection regulations. In addition, we may transfer your data to processors (e.g. IT service providers for customer/supplier management systems, survey tools) and third parties required for the organisation of training courses or other events (e.g. seminar organisers, trainers).

### 3.4 Adherence to legal obligations and compliance requirements (in particular comparison with existing sanctions lists)

Purpose: The compliance with legal obligations (such as requirements under data protection, export or antitrust law), the verification of compliance with agreed voestalpine guidelines (e.g. code of conduct), but also the comparison of business contact data for matches with names on sanctions lists, may make it necessary that your data is processed for these purposes.

Data categories: Basic data of the data subject (e.g. name, nationality), professional contact details (e.g. address, email address); any data that indicates or proves a breach of a compliance requirement or a legal obligation.

Legal basis:

- » Art 6 (1) (c) GDPR – compliance with a legal obligation
- » Art 6 (1) (f) GDPR - legitimate interests: Detection of breaches of compliance requirements and the establishment, exercise or defence of legal claims resulting therefrom; compliance with prohibition standards (in particular sanction lists to avoid high fines).

Storage period: We store your data until the purpose has been fulfilled. After fulfilment of the purpose, your data will only be stored if there is a legal obligation to retain it or another significant reason for further storage can be cited. This may be the case, for example, if we need your data to establish, exercise or defend legal claims.

Categories of recipients: Processors (IT service providers); the data collected for this purpose may also be transferred to courts, administrative authorities and legal representatives.

#### **4 Data transfers to third countries**

Due to the complexity of today's data processing processes, we engage processors to process your data. As far as possible, we only use processors that are based within the European Union or the European Economic Area and are therefore subject to the GDPR.

In exceptional cases, however, we may transfer data to third countries (i.e. outside the European Union or the European Economic Area) and have it processed there. If we transfer data to third countries, the transfer takes place exclusively in compliance with the required conditions of admissibility (in particular the existence of an adequacy decision by the EU Commission, conclusion of standard data protection clauses including - if necessary - additional agreement of further technical and organisational as well as contractual measures). If your data is transferred to a third country, you can request a copy of the appropriate or suitable safeguards from our data protection organisation.

#### **5 Rights of data subjects and the right to lodge a complaint**

- » In accordance with Art 15 GDPR, you have the right to obtain confirmation from us as the controller as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right of access to your personal data.
- » In accordance with Art 16 GDPR, you have the right to request the rectification of inaccurate data concerning you and/or the completion of incomplete personal data without undue delay.
- » In accordance with Art 17 GDPR, you have the right to obtain the erasure of your personal data.
- » In accordance with Art 18 GDPR, you have the right to obtain the restriction of processing of your personal data.
- » In accordance with Art 20 GDPR, you have a right to data portability.
- » In accordance with Art 21 GDPR, you have the right to object to the processing of your personal data.
- » If your data is processed on the basis of your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- » Finally, you have the right to lodge a complaint with the supervisory authority responsible for you.

## 6 Contact details

For questions on the subject of data protection and to assert your aforementioned rights, please contact our data protection organisation by e-mail at [datenschutz.bohler-edelstahl@voestalpine.com](mailto:datenschutz.bohler-edelstahl@voestalpine.com) or by post at voestalpine BÖHLER Edelstahl GmbH & Co KG, Mariazeller Strasse 25, A-8605 Kapfenberg with the subject "Data Protection".

Parts of this Data Protection Notice for Business Partners may be changed or updated by us for technical or legal reasons without prior notice to you. Please always check the current version of the Data Protection Notice for Business Partners to ensure that you are up to date with any changes or updates.