

## Data Protection Statement on Social Media Offering

In addition to the information in the general data protection statement, you will find in this document information regarding the processing of personal data in connection with our social media offering. For the content of social media presentations, the following institution is the controller according to Art. 4(1)(7) GDPR:

**voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter “we”, “us”)**  
Mariazellerstraße 25, 8605 Kapfenberg, Austria

If you do not wish to have your relevant personal data processed in connection with social media platforms such as Facebook, Instagram, LinkedIn and so on you may instead contact us at our website [www.bohler-edelstahl.com](http://www.bohler-edelstahl.com) or [www.voestalpine.com/bohler-edelstahl](http://www.voestalpine.com/bohler-edelstahl).

The operation of our social media offering serves to provide a consistent means of providing information and communicating with employees, business partners and interested parties. In the course of this, we use social media platforms such as Facebook, Instagram, LinkedIn and YouTube for the following purposes:

- » providing information about job offers
- » providing information about products
- » conducting public relations work (information about events, measures taken in the context of environmental protection and sustainability, social projects).

We thus base our operation of a social media offering on our legitimate interests under Art. 6 (1)(f) GDPR for providing an up-to-date and supportive opportunity for informing and interacting with the users and visitors of our social media sites. In addition, processing the personal data of users is done on the basis of, on the one hand, your consent pursuant to Art. 6 (1)(a) GDPR that you granted, where applicable, when creating a user profile on a social media platform, and on the other hand, on the basis of a legitimate interest (according to Art. 6 (1)(f) GDPR) of the platform operators in market research, marketing analyses and the accompanying improvement of their advertising systems.

If you visit one of our presentations in social media, your visit will initiate processing of your personal data. In this event, we are in some cases jointly responsible with the operator of the respective social network for these data processing operations within the meaning of Art. 26 GDPR. Insofar as possible, we have concluded agreements with the operators of social networks for joint responsibility under Art. 26 GDPR.

Please note that, despite the joint responsibility under Art. 26 GDPR with the operators of social networks, we do not have influence to the full extent over the data processing of the individual social networks. The company policy of the respective provider has a significant influence on our options.

In the following sections, we provide you with information about the processing of personal data that occurs within the framework of your visit to our social media sites.

## 1 Facebook

We wish to note that you are solely responsible for your use of our Facebook page and its functions. This applies in particular for the use of interactive functions such as the comments and the ratings.

### 1.1 Name and address of the controller

When you visit our Facebook site <https://m.facebook.com/voestalpineboehleredelstahl/>, personal data is processed in this context namely, irrespective of whether you are registered on Facebook or not. With respect to this data, the following institutions are (pursuant to a decision of the European Court of Justice) joint controllers within the meaning of Art. 26 GDPR for operating this site:

**Meta Platforms Ireland Ltd. (hereinafter, "Meta")**  
4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland

and

**voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter "we", "us")**  
Mariazellerstraße 25, 8605 Kapfenberg, Austria

For the purpose of structuring and sharing the tasks and obligations, Facebook concluded an agreement with each Fan Page operator concerning joint responsibility according to Art. 26 GDPR. This can be retrieved at [https://www.facebook.com/legal/terms/page\\_controller\\_addendum/](https://www.facebook.com/legal/terms/page_controller_addendum/).

### 1.2 Data categories, purpose of the processing

We process your Facebook user name as well as your interactive actions such as "like" statements, comments, etc. that you have placed on our Facebook site.

In addition, when visiting our Facebook site, Facebook collects your IP address as well as your behavior on our Fan Page by means of cookies. This involves small text files that are stored by Facebook by way of the browser on a storage medium of the terminal device (PC, Notebook, Tablet, Smartphone, etc.) used by the website visitor. These cookies contain characteristic search strings that allow for an unambiguous identification of the browser when the website is once again retrieved.

On the one hand, cookies allow for an analysis of user data for statistical purposes they can be very useful for us, the Fan Page operator. Such an analysis with data about the number of visits to our site, the extent of interactions, the visits and the average duration of video playback, information about which countries and cities our visitors come from and statistics about the gender ratio of our visitors is provided to us by Facebook by means of the function "Facebook Insights" in an anonymized form. Consequently, we categorically do not receive and process any personal data from users who retrieve our site. On the other hand, the collection of data through cookies aids Facebook in ongoing improvement of its system with regard to personalized advertising.

If you are presently logged in with Facebook as a user, then there is a cookie with your Facebook identifier located on your device. In this way, Facebook is in the position to trace the fact that you have visited this site and how you used it. Based on this data, content and advertisements may be offered that are tailored to you. If you wish to avoid this, you should log out of Facebook and/or deactivate the function "remain logged in",

delete the cookies existing on your device, and close and restart your browser. In this manner, Facebook information by which you can be directly identified will be deleted. In this way, you can use our Facebook site without disclosing your Facebook identifier. If you access interactive functions on the site (like button, comments, sharing, etc.), Facebook will request that you log in. After logging in, you are recognizable for Facebook as a certain user. You may find instructions about how to manage and delete existing information at <https://www.facebook.com/about/privacy>

### **1.3 Transfer and disclosure of personal data**

Within our company, only those persons and offices receive access to your data disclosed in Facebook that require personal data for performing the above-mentioned purposes.

Facebook does not conclusively and clearly specify, and we are not aware of the manner in which Facebook uses the data from visits to Facebook pages for its own purposes, to what extent activities on the pages can be attributed to individual users, how long Facebook stores this data and whether data from a visit of the pages is transferred to third parties.

Likewise, we cannot rule out that your data gathered by Facebook will be transferred to countries outside of the European Union in which the data is subject to a lesser level of protection than in the EU. Which information Facebook receives and how it is used is described by Facebook in a general form in its data use policy <https://www.facebook.com/privacy/explanation>

### **1.4 Storage periods**

Where no explicit storage period is stated in the case of collection (e.g., under a declaration of consent) or in the case of detailed information, we will erase or anonymize your personal data insofar as it is no longer required to fulfill the storage purpose and this is not contrary to any statutory retention obligations.

Your messages sent to us via Facebook will be deleted not later than 6 months after the end of the conversation if your inquiry was answered and there is no other reason that authorizes or obligates us to store the specified messages.

We have no knowledge of how long Facebook maintains your data that is stored in cookies. However, you may delete stored cookies at any time in your browser settings. You may likewise generally prevent the placement of cookies in advance by means of using your browser settings.

## 2 Instagram

We wish to note that you are solely responsible for your use of our Instagram page and its functions. This applies in particular for the use of interactive functions such as the comments and the ratings.

### 2.1 Name and address of the controller

If you visit our Instagram site <https://instagram.com/voestalpineboehleredelstahl>, personal data will be processed in this connection. With respect to this data, the following institutions are joint controllers according to Art. 26 GDPR responsible for operating this Fan Page:

**Instagram Inc. (hereinafter, "Instagram")**  
1601 Willow Road, Menlo Park, 94025, California, U.S.

and

**voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter "we", "us")**  
Mariazellerstraße 25, 8605 Kapfenberg, Austria

The Instagram service is a product provided by Meta Platforms Ireland Limited. For the purpose of structuring and sharing the tasks and obligations, Meta concluded an agreement with each Fan Page operator concerning joint responsibility according to Art. 26 GDPR. This can be retrieved at [https://www.facebook.com/legal/terms/page\\_controller\\_addendum/](https://www.facebook.com/legal/terms/page_controller_addendum/).

### 2.2 Data categories, purpose of the processing

When you visit our Instagram site, we process your Instagram user name, as well as interactive actions such as "likes", comments, etc. that you place on our Instagram site.

When visiting our Instagram site, Instagram collects your IP address as well as your behavior on our site by the means of cookies. This involves small text files that are stored by Facebook by way of the browser on a storage medium of the terminal device (PC, Notebook, Tablet, Smartphone, etc.) used by the website visitor. These cookies contain characteristic search strings that allow for an unambiguous identification of the browser when the website is once again retrieved.

Instagram makes available to us, on the basis of information obtained from the cookies, statistical evaluations on the use of our Instagram site such as the number of visitors on our website, the range of posts, information about which countries and cities our visitors come from and statistics about the gender ratio of our visitors. These statistical evaluations are made available to us by Instagram by means of the function "Instagram Insights" in an anonymized form, by which we do not receive any personal data on individual users of the site.

The data gathered about you in this context is processed by Instagram and in so doing, may be transferred to countries outside of the European Union if necessary. Which information Instagram obtains and how it is used is described by Instagram in a general form in its data protection guidelines at <https://help.instagram.com/519522125107875>.

If you are presently logged in with Instagram as a user, then there is a cookie with your Instagram identifier located on your device. In this way, Instagram is in the position to trace the fact that you have visited this site

and how you used it. Based on this data, content and advertisements may be offered that are tailored to you. If you wish to avoid this, you should log out of Instagram and/or deactivate the function “remain logged in”, delete the cookies existing on your device, and close and restart your browser. In this manner, Instagram information by which you can be directly identified will be deleted. In this way, you can use our Fan Pages site without disclosing your Instagram identifier. If you access interactive functions on the site (Like button, comments, sharing, etc.) Instagram will request that you log in. After any log in, you are recognizable for Instagram as a certain user. You may find instructions about how to manage and delete existing information at <https://help.instagram.com/>.

### **2.3 Transfer and disclosure of personal data**

Within our company, only persons and offices receive access to this data who require personal data for performing the above-mentioned purposes.

Instagram does not conclusively and clearly specify, and we are not aware of the manner in which Instagram uses your data from visits to Instagram pages for its own purposes, to what extent activities on the pages can be attributed to individual users, how long Instagram stores this data and whether data from a visit of the pages is transferred to third parties.

Likewise, we cannot rule out that your data gathered by Instagram will be transferred to countries outside of the European Union in which the data is subject to a lesser level of protection than in the EU. Which information Instagram receives and how it is used is described by Instagram in a general form in its data use policy <https://help.instagram.com/519522125107875>.

### **2.4 Storage periods**

Where no explicit storage period is stated in the case of collection (e.g., under a declaration of consent) or in the case of detailed information, we will erase or anonymize your personal data insofar as it is no longer required to fulfill the storage purpose and this is not contrary to any statutory retention obligations.

Your messages sent to us via Instagram will be deleted not later than 6 months after the end of the conversation if your inquiry was answered and there is no other reason that authorizes or obligates us to store the specified messages.

In the absence of any knowledge in this regard, we cannot provide any information about storage periods for the cookies placed by Instagram. However, you may delete stored cookies at any time in your browser settings. You may likewise generally prevent the placement of cookies in advance by means of using your browser settings.

### 3 LinkedIn

We wish to note that you are solely responsible for your use of our LinkedIn page and its functions. This applies in particular for the use of interactive functions such as the comments and the ratings.

#### 3.1 Name and address of the controller

If you visit our LinkedIn site <https://www.linkedin.com/company/voestalpine-bohler-edelstahl/>, personal data will be processed in this connection. With respect to this data, the following institutions are joint controllers according to Art. 26 GDPR responsible for operating this Fan Page:

**LinkedIn Ireland Unlimited Company (hereinafter, "LinkedIn")**

Wilton Plaza, Wilton Place, Dublin 2, Ireland

and

**voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter "we", "us")**

Mariazellerstraße 25, 8605 Kapfenberg, Austria

For the purpose of structuring and sharing the tasks and obligations, LinkedIn concluded an agreement with each website operator concerning joint responsibility according to Art. 26 GDPR. This may be retrieved at <https://legal.linkedin.com/pages-joint-controller-addendum?form=MY01SV&OCID=MY01SV>.

#### 3.2 Data categories, purpose of the processing

When you visit our LinkedIn site, we process your LinkedIn user name, as well as interactive actions such as "likes", comments, etc. that you place on our LinkedIn site.

When visiting our LinkedIn site, LinkedIn collects your behavior on our site by means of cookies. This involves small text files that are stored by LinkedIn by way of the browser on a storage medium of the terminal device (PC, Notebook, Tablet, Smartphone, etc.) used by the website visitor. These cookies contain characteristic search strings that allow for an unambiguous identification of the browser when the website is once again retrieved.

LinkedIn makes available to us, on the basis of information obtained from the cookies, statistical evaluations on the use of our LinkedIn site such as the number of visitors on our website, the extent of interactions, information about which countries and cities our visitors come from and statistics about the work sectors of our visitors. These statistical evaluations are made available to us by LinkedIn by means of the function "LinkedIn Page Insights" in an anonymized form, by which we do not receive any personal data on individual users of the site.

The data gathered about you in this context is processed by LinkedIn and in so doing, may be transferred to countries outside of the European Union if necessary. Which information LinkedIn obtains and how it is used is described by LinkedIn in a general form in its data protection guidelines at <https://www.linkedin.com/legal/privacy-policy>.

### 3.3 Transfer and disclosure of personal data

Within our company, only persons and offices receive access to this data who require personal data for performing the above-mentioned purposes.

LinkedIn does not conclusively and clearly specify, and we are not aware of the manner in which LinkedIn uses the data from your visits to LinkedIn pages for its own purposes, to what extent activities on the pages can be attributed to individual users, how long LinkedIn stores this data and whether data from a visit of the pages is transferred to third parties.

Likewise, we cannot rule out that your data gathered by LinkedIn will be transferred to countries outside of the European Union in which the data is subject to a lesser level of protection than in the EU. Which information LinkedIn receives and how it is used is described by LinkedIn in a general form in its data use policy <https://www.linkedin.com/legal/privacy-policy>.

### 3.4 Storage periods

Where no explicit storage period is stated in the case of collection (e.g., under a declaration of consent) or in the case of detailed information, we will erase or anonymize your personal data insofar as it is no longer required to fulfill the storage purpose and this is not contrary to any statutory retention obligations.

Your messages sent to us via LinkedIn will be deleted not later than 6 months after the end of the conversation if your inquiry was answered and there is no other reason that authorizes or obligates us to store the specified messages.

In the absence of any knowledge in this regard, we cannot provide any information about storage periods for the cookies placed by LinkedIn. However, you may delete stored cookies at any time in your browser settings. You may likewise generally prevent the placement of cookies in advance by means of using your browser settings.

## 4 YouTube

### 4.1 Name and address of the controller

Videos are integrated into our website that are stored on <http://www.YouTube.com> and retrieved from there. As soon as you play a video over our website or our YouTube channel [https://www.youtube.com/channel/UCvphSa\\_l4s7PKpvcpx0\\_BUA/featured](https://www.youtube.com/channel/UCvphSa_l4s7PKpvcpx0_BUA/featured), personal data is processed. With respect to this data, the following institution is the responsible controller according to Art. 4 GDPR:

**voestalpine BÖHLER Edelstahl GmbH & Co KG (hereinafter “we”, “us”)**  
Mariazellerstraße 25, 8605 Kapfenberg, Austria

In order to ensure the operation of our YouTube channel, we make use of the following processor associated with the Google Group:

**YouTube LLC (hereinafter, “YouTube”)**  
901 Cherry Ave., San Bruno, California 94066, U.S.

### 4.2 Data categories, purpose of the processing

When you play our YouTube videos, we process your YouTube user name, as well as interactive actions such as “likes”, comments, etc. that you place on our YouTube channel.

YouTube also gathers your behavior by means of cookies when you retrieve YouTube videos. This involves small text files that are stored by Google by way of the browser on a storage medium of the terminal device (PC, Notebook, Tablet, Smartphone, etc.) used by the website visitor. These cookies contain characteristic search strings that allow for an unambiguous identification of the browser when the website is once again retrieved.

YouTube makes available to us statistical evaluations about the use of our YouTube channel from the information obtained from the cookies. This statistical information involves the number of visits to our website, the extent of interactions, the average duration of video playbacks, information about which countries and cities our visitors come from and statistics about the gender ratio of our visitors. These statistical evaluations are made available to us by YouTube by means of the function “Google Analytics” in an anonymized form, by which we do not receive any personal data on individual users.

Whenever you play a video, various personal data is transmitted to YouTube such as the IP address, date and time of the request, time zone, content of the request (specific page), website from which the request originates, browser, operating system and its interface, language and version of the browser software, hardware used (PC, Smartphone, etc.), and location (if Google Maps is activated). Which information YouTube receives and how it is used is described by YouTube in a general form in its data use policy <https://policies.google.com/privacy?hl=en-GB>

By playing videos stored on our website, YouTube receives the information that you have retrieved the relevant subpage of our website. If you are logged into Google, this data will be directly associated with your account. If you do not wish for this matching with your profile at YouTube to occur, you must log out prior to activating the button. In addition, YouTube also stores data if you do not have a Google user account; these are, in



particular: IP address, search queries, browser and operating system version. YouTube stores the identified data as a usage profile and utilizes it for purposes of marketing, market research and/or website design when required. Such an analysis is done in particular (also for users not logged in or users without a corresponding account) for providing appropriate advertising and in order to inform other users of the social network about your activities on our website. You may find information on the terms of use and the processing of personal data by YouTube at <https://www.youtube.com/t/terms>

#### **4.3 Transfer and disclosure of personal data**

Within our company, only those persons and offices receive access to data disclosed by YouTube that are required for performing the above-mentioned purposes.

For operating our YouTube channel, we utilize YouTube as the processor. As a rule, the information of this processor gathered by cookies are sent to a server in the U.S. and stored there. In the case of transferring data into the U.S., the data transmission is based on the existence of standard contract clauses.

We wish to expressly note that YouTube does not conclusively and clearly specify, and we are not aware of the manner in which YouTube uses the data from retrieving YouTube videos for its own purposes, to what extent activities on the pages can be attributed to individual users, how long YouTube stores this data and whether data from a visit of the pages is transferred to third parties.

#### **4.4 Storage periods**

Where no explicit storage period is stated in the case of collection (e.g., under a declaration of consent) or in the case of detailed information, we will erase or anonymize your personal data insofar as it is no longer required to fulfill the storage purpose and this is not contrary to any statutory retention obligations.

In the absence of any knowledge in this regard from YouTube, we cannot provide any information about storage periods for the cookies placed by YouTube. However, you may delete stored cookies at any time in your browser settings. You may likewise generally prevent the placement of cookies in advance by means of using your browser settings.

## 5 Rights of data subjects

As a visitor of our social media sites, you may assert the following rights with us:

- » According to Art. 15 GDPR, you have the right to request confirmation as to whether personal data are being processed by the controller and the right to information about such data.
- » According to Art. 16 GDPR, you have the right to request the rectification, without undue delay, of inaccurate data concerning you and/or to request the completion of incomplete personal data.
- » According to Art. 17 GDPR, you have the right to the erasure of your personal data.
- » According to Art. 18 GDPR, you have the right to restriction of processing of your personal data.
- » According to Art. 20 GDPR, you have a right to data portability.
- » According to Art. 21 GDPR, you have a right to object to processing of the data.
- » If the processing of your data is performed based on your consent, there is the right to withdraw consent at any time without affecting the lawfulness of the processing that has been performed based on consent before its withdrawal.

To assert your rights as a data subject, please contact us at voestalpine BÖHLER Edelstahl GmbH & Co KG, as the “Controller” within the meaning of Art. 4(7) GDPR at any time by means of a letter to Mariazellerstraße 25; A-8605 Kapfenberg, to the attention of the Data Protection Manager or by emailing [datenschutz.boehler-edelstahl@voestalpine.com](mailto:datenschutz.boehler-edelstahl@voestalpine.com).

Meta Platforms Ireland Limited has assumed primary responsibility for the processing of personal data via the service “Insights” offered by way of Facebook and Instagram. This relates to the processing of Insights data and the assertion of the rights of data subjects. As a result, please contact Meta directly in order to learn of all obligations arising from the GDPR with regard to the processing of Insights data. Although you may assert your rights towards us, we will forward the inquiries we receive from you in this regard to Meta.

LinkedIn has assumed the primary responsibility for processing personal data via the “Page Insights” service offered by LinkedIn. This relates to the processing of “Page Insights” data and the assertion of the rights of data subjects. As a result, please contact LinkedIn directly with respect to all obligations arising from the GDPR associated with the processing of “Page Insights” data. Although you may assert your rights towards us, we will forward the inquiries we receive from you in this regard to LinkedIn.

If you are of the opinion that your personal data is not being processed in accordance with the law, you have the option of filing a complaint with the data protection authority.

This data protection statement for our social media offering will be adapted from time to time. The date on which it was last updated can be found in the footer.