

Data Protection Notice according to the EU General Data Protection Regulation for business partners and/or their contacts



MANNESMANN
LINE PIPE

A Member of the Salzgitter Group

The following information is intended to give you as a business partner (customers, suppliers/service providers and interested parties) an overview on how we process your personal data as well as on your rights under data protection law. Which data is processed depends primarily on the nature and scope of the existing business relationship. If applicable, further data protection information may be relevant for you, e. g. when you visit our website or use IT applications provided by us.

Please pass this information on to all current and future authorized representatives and contact persons in your company.

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

Responsibility in terms of the data protection law:

Mannesmann Line Pipe GmbH
In der Steinwiese 31
57074 Siegen
Germany
Phone: +49 271 691-0

You can reach our internal **Data Protection Officer** under the address and phone number above or by email to:

datenschutz.mlp@mannesmann.com

2. Which data do we use and how do we obtain it?

For the initiation and pursuance of our business relationship, we process, in particular, the following data categories of our business partners and/or their contacts, which we have legitimately obtained from them or from other Salzgitter Group companies or third parties (such as Schufa), for example, for the fulfilment of contractual obligations or on the basis of their given consent. Furthermore, we process data legitimately obtained from publicly accessible sources (e. g. trade registers, press, internet).

Relevant personal data may include:

- Personal/contact data (e. g. first name, surname, company, address, (mobile) phone number, telefax, email)
- Contractual and billing data (e. g. bank details, goods/services ordered, invoice data)
- Communication data from correspondence (emails, letters)
- Identity verification data (e. g. identification documents), authentication data (e. g. signature samples), Schufa (credit rating agency) score
- When accessing or using our IT applications: Log data (e. g. user ID, time stamp, type of access)

3. What is the purpose of processing your data and on which legal basis do we do it?

The object of our company is the manufacture and distribution

of steel tube and pipe and all the related technical and commercial services. The processing of your data is primarily linked to our pursuit of this object and is based on the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Law on Data Protection (BDSG) as well as all other applicable laws (e.g. HGB (German Commercial Code), Tax Code (AO), etc.).

a. For the fulfilment of contractual obligations or for pre-contractual measures (Article 6 (1) b) GDPR)
Our processing of personal data primarily serves the fulfilment of contracts with our business partners, in particular customers, suppliers and service providers. This also includes the conduction of pre-contractual measures following a business partner's enquiry.

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

Where required, we process your data beyond the actual fulfilment of contractual obligations in order to safeguard legitimate interests pursued by us or a third party.

Examples

- Review and optimization of needs analysis procedures and for direct customer contact
- Advertising or market and opinion research, unless you have objected to the use of your data
- Assertion of legal claims and defense in legal disputes
- Facilitate IT security and IT operation
- Prevention of crimes
- Building and site security services, theft protection (video surveillance)
- Access control.

c. Based on your consent (Article 6 (1) c) GDPR)

If you have granted us your consent to process your personal data for specific purposes (e.g. newsletters), such processing is legitimate on the basis of your consent. Consent given can be revoked at any time. This also applies to declarations of consent that were given to us before the GDPR came into force, i.e. before May 25, 2018. Please note that your revocation cannot be backdated and is only effective for the future. Data processed before your revocation are not affected thereby.

d. Due to statutory requirements (Article 6 (1) c) GDPR) or in the public interest (Article 6 (1) e) GDPR)

Furthermore, we are subject to various legal obligations, i. e. statutory requirements, e. g. tax-law and customs regulations, certifications, etc.

4. Who receives your data?

Within our company, any unit that requires your data to fulfill our contractual and legal obligations or for the purposes set out above will have access to it. Service providers and vicarious agents appointed by us can also receive data for the purposes given.

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Information about you may only be forwarded to third parties if legal provisions demand this or you have given your consent. Recipients of your data are obliged to adhere to data protection requirements. Under the above mentioned conditions, recipients of personal data may include the following

- Public authorities and institutions (e.g. financial authorities) on the basis of statutory or official obligations.
- External processors to whom we transfer personal data for conducting our business relationship with you (e.g. support/maintenance of IT systems, data erasure, payment transactions, accounting, service providers).
- Any other bodies for which you have given your consent regarding data transfer.

Your personal data will not be transferred to recipients outside the EU or the EEU (so-called third states).

5. For how long will your data be stored?

We will process and store your personal data for as long as necessary with regard to the purposes mentioned under clause 3 above. It should be noted here that, as a rule, our business relationship is designed for the long term. If the data is no longer required for the fulfilment of our contractual and/or statutory obligations, it will be deleted, unless its further processing is temporarily required for the following purposes:

- Compliance with trade or tax retention periods, e.g. according to the German Commercial Code or Tax Code. The retention periods laid down therein amount to between two and ten years.
- Preservation of evidence within the framework of the statute of limitations (e.g. Article 195 et seq. German Civil Code).

6. Your rights regarding data protection

Every data subject has the right of **access** pursuant to Article 15 GDPR, the right to **rectification** pursuant to Article 16 GDPR, the right to **erasure** pursuant to Article 17 GDPR, the right to **restriction of processing** pursuant to Article 18 GDPR, the right to **object** pursuant to Article 21 GDPR, and the right to **data portability** pursuant to Article 20 GDPR. As far as the right of access and the right to erasure are concerned, the restrictions pursuant to Sections 34 and 35 Federal Data Protection Act are applicable. Moreover, there is a **right to appeal** to a competent data protection supervisory authority (Article 77 GDPR in conjunction with Section 19 Federal Data Protection Act).

You can withdraw consent granted to us for the processing of personal data at any time. This also applies to withdrawing declarations of consent that were made to us before the GDPR came into force, i.e. before May 25, 2018. Please note that the withdrawal cannot be backdated and only applies to the future.

Processing that was carried out before the withdrawal is not affected by it.

7. Are you under any obligation to provide data?

In the context of our business relationship, you must provide any personal data required for establishing and pursuing a business relationship and fulfilling the related contractual obligations or that we are legally obliged to collect.

8. To what extent will decision-making be automated (including profiling)?

We do not use automated decision-making or profiling processes.

Information on your right of objection according to Article 21 GDPR

1. Right to object in individual cases

You have the right to object, for reasons relating to your particular situation, to the processing of your personal data on the basis of Article 6 (1) e) GDPR (data processing in the public interest) and Article 6 (1) f) (data-processing on the basis of balancing of interests) at any time.

If you do object, we will no longer process your personal data unless we have compelling justified reasons for such processing which take precedence over your interests, rights and freedom or, alternatively, such processing serves to assert, exercise or defend legal claims.

2. Right to object against the processing of data for advertising purposes

In specific cases we process your personal data for the purpose of direct marketing. You have the right to object at any time against the processing of your personal data for the purpose of this kind of advertising. If you object to the processing for the purpose of direct advertising we will no longer process your personal data for these purposes. This objection that can be sent via email to datenschutz.mlp@mannesmann.com does not have to follow any specific form.