

CUSTOMER AND BUSINESS PARTNER PRIVACY NOTICE

The protection of your personal data is a particular concern of Stahlwerk Thüringen GmbH, Kronacher Str. 6, 07333 Unterwellenborn (hereinafter also referred to as "**we**", "**us**" or "**our**").

Any personal data transmitted, received or created by you within the scope of our business relationship will be treated confidentially and in accordance with the statutory data protection provisions, in particular the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; "DS-GVO") and the Federal Data Protection Act, as well as this Privacy Notice. In the following, we would like to inform you in detail about which of your personal data we collect within the scope of our business relationship, how it is used and which control and information rights you may be entitled to.

1. Definitions

- **Personal data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to that person.
- **Processing** means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. Responsible

Responsible for data processing and related data processing operations according to article 4 no. 7 GDPR:

Stahlwerk Thüringen GmbH, Kronacher Str. 6, 07333 Unterwellenborn, Germany

Telephone: +49 3671 4550 0

E-mail: info@stahlwerk-thueringen.de

3. Data Protection Officer

Our data protection officer is Mr Werner Zink.

Mr Zink can be contacted by post: Stahlwerk Thüringen GmbH, Mr Werner Zink, Kronacher Str. 6, 07333 Unterwellenborn

by e-mail: werner.zink@stahlwerk-thueringen.de

or by telephone: +49 3671 4550 6285.

4. Individual Processing

4.1 Types of Data

If you are our customer or business partner or in case you are employed by or represent one of our customers or business partners, we store the following personal data in order to provide you with our services or to obtain services from you:

- (a) **contact information**, in particular title, name, academic title, business telephone number, mobile phone number, fax number, email address and company, delivery and billing address; if you have concluded a contract with us: payment data, such as information required for the processing of payment transactions or fraud prevention (IBAN, BIC, credit card data);
- (b) **content of correspondence**, in particular e-mails received and sent, files stored in our document management system or in end devices (e.g. laptops, smartphones, tablets) or files disclosed within the scope of our or your customer service, in the event of questions regarding deliveries and services or in the event of complaints;
- (c) **details of contractual relationship**, in particular the contact information, the VAT identification number, the content of your or our order and concluded contracts, any preferences regarding our services and products;
- (d) **business cards**, received from you, the contents of the business card, including but not limited to your name, academic title, business telephone number, mobile phone number, fax number, email address, company address and any other information you provide on your business card.

4.2 Purpose and Lawfulness of Processing

We collect this personal data in particular for the purpose of contract processing (shipping, after-sales, complaint management), for checking the creditworthiness of our customers and business partners, for customer or business partner support and communication with our customers or business partners (or their representatives) in the context of questions about services, products or in the context of customer service, in order to create a customer or business partner file and, if necessary, to settle legal disputes, enforce contracts and assert, defend and exercise legal claims or to detect and prosecute fraudulent and other illegal activities.

Insofar as you have entered into a contract with us, the legal basis for the processing is laid down in this clause 4, Art. 6 (1) (b) GDPR. This processing is necessary for the performance of the contract, such as initiation, conclusion, implementation, execution and termination of the contract with you.

Insofar as we are legally obliged to store the data, the legal basis for the processing in compliance with this clause 4 is Art. 6 (1) (c) GDPR. We store the personal data in order to fulfil existing tax or commercial law obligations.

Insofar the company that employs you or that you represent has concluded a contract with us, the legal basis for processing in accordance with this clause 4 is Art. 6 (1) (f) GDPR.

Based on our legitimate interests, we process your personal data for the purpose of fulfilling the contract that your company has concluded with us or to provide pre-contractual measures, to carry out a credit check, for internal company organisation and to answer any enquiries.

5. Processing your Data upon Registration in our Customer Area

When you log in to our customer area, we process your following personal data thus enabling your direct requests and providing information about your order status, provided this has been agreed:

- **contact information**, title, name, first name, academic title, business e-mail-address as well as company name and address of your company or of the company you work for.

The legal basis for this data processing is laid down in Art. 6 (1) (b) GDPR. We process the aforementioned personal data for the purpose to process your enquiry about an order or its relevant status.

6. Video Surveillance

- 6.1 The video surveillance that takes place in our company is limited to our company premises. It is used exclusively for the inspection of goods and the control of incoming and outgoing freight, the security of sensitive operating areas as well as for quality assurance and error analysis of production areas. Our cameras are aligned in such a way that as few people as possible are captured. However, it cannot be ruled out that you may also be recognised on the video or image recording, for example during delivery or collection or when you visit our company. Each recording is assigned the date and time of the recording as well as the number of the recording camera.

6.2 Legal Basis

The legal basis for processing in accordance with this clause 6 is Art. 6 (1) (f) GDPR. We have a legitimate interest in controlling the incoming and outgoing of our goods, in ensuring the quality of the goods and the securing of the load by means of visual controls and in monitoring the flow of visitors in order to exercise our domiciliary rights.

You have the right to object at any time to this type of data processing, which is based on our legitimate interest, for reasons arising from your particular situation. To exercise this right, you can contact us at any time using the contact details provided in clause 2.

6.3 Storage Period

Image and video files are automatically overwritten and thus deleted when the storage space is full. However, the image and video files are deleted after 48 hours at the latest. In case that there are sufficient factual indications of a criminal offence, or in individual cases, if this is required for preserving evidence for possible legal disputes in the inspection of goods, quality or secur-

ing of loads, the relevant time periods of the video recordings are stored beyond the aforementioned period until the purpose for which we have longer stored the video recording is achieved.

7. Transfer of personal data to third parties

7.1 We may transfer your personal data to our affiliated group companies, in particular to our parent company Companhia Siderúrgica Nacional (“**CSN**”) pursuant to Art. 6 (1) (f) GDPR.

The data transfer is for internal administrative purposes. We have a legitimate interest in disclosing your personal data for internal administrative purposes, in particular as part of our regular reporting activities.

You have the right at any time to object to this type of data processing, which is based on our legitimate interest, for reasons arising from your particular situation. To exercise this right, you can contact us at any time using the contact details provided in clause 2.

Where these affiliated group companies have their registered office outside the European Union or the European Economic Area, they either have their registered office in third countries for which an adequacy decision has been issued by the European Commission, or an adequate level of protection is guaranteed by standard data protection clauses issued by the European Commission which have been concluded by us and the respective affiliated company.

7.2 In addition, your personal data will be disclosed to the following third parties within the framework of our business relationship:

- logistics companies in road and rail transport for delivery of our products to your destination;
- banking service provider to process the payment;

Please note that we cannot name certain data recipients, as they are either only commissioned in individual cases, are only associated with us for a short period of time or other justified interests speak against notification.

Insofar as you have entered into a contract with us, the legal basis for the processing is laid down in this clause 7.2., Art. 6 (1) (b) GDPR. This processing is necessary for the initiation, conclusion, implementation, execution and termination of the contract with you.

Insofar the company that employs you or that you represent has concluded a contract with us, the legal basis for processing in accordance with this clause 7.2. is Art. 6 (1) (f) GDPR. The processing is necessary for the purposes of our legitimate interests to fulfil the contract your company has with us.

- 7.3 In accordance with applicable data protection law, we may disclose your personal data to external processors (Article 28 GDPR) who act on our behalf and provide services in connection with our business relationship.

The data transfer takes place on the basis of order processing contracts. Our commissioned processors may only process your personal data insofar as this is necessary for the fulfilment of their specific tasks. They are contractually obliged to process your personal data only on our behalf and in compliance with our instructions.

Where these processors have their registered office outside the European Union or the European Economic Area, they either have their registered office in third countries for which an adequacy decision has been issued by the European Commission, or an adequate level of protection is guaranteed by standard data protection clauses issued by the European Commission which have been concluded by us and the external processor.

In particular, your personal data will be disclosed to the following third parties, as processors, for the aforementioned purposes:

- IT-Support-Service Provider

Please note that we cannot name certain data recipients, as they are either only commissioned in individual cases, are only associated with us for a short period of time or other justified interests speak against notification.

- 7.4 We may disclose your personal data if we are legally entitled or obliged to do so (e.g. due to applicable law or a court or official order).

8. Processing outside the European Economic Area

We may also transfer your business contact details in connection with orders from or to a country outside the European Union or the European Economic Area to that country from which your order comes or to which your order goes.

This transfer to a country outside the European Union or the European Economic Area has its legal basis pursuant to Art. 49 (1) (b) GDPR. The data transfer is necessary for the performance of your order.

9. Data Security

We have state-of-the-art security measures in place to protect your personal data from loss, misuse and alteration. For example, our security guidelines and the Privacy Notice are regularly reviewed and improved as necessary. In addition, only authorised employees have access to personal data. Although we cannot guarantee or warrant that loss, misuse or alteration of personal data will never occur, we do everything in our power to prevent it.

10. Storing your Personal Data

We will delete your personal data as soon as they are no longer needed for the purpose for which it was collected or if this is required by law.

If you have concluded a contract with us, your personal data will generally be deleted three years after the end of the year in which our business relationship ended.

Insofar the company that employs you or that you represent has concluded a contract with us, your personal data will be deleted within 6 months of us becoming aware that you have left the company. If your personal data has not already been deleted earlier due to departure, your personal data will generally be deleted three years after the end of the year in which the business relationship with your company was terminated.

The aforementioned time limits do not apply if a longer retention period is required for the following reasons:

- If your personal data are required for the fulfilment of existing obligations under commercial or tax law, we may store your personal data for a longer period of time. In these cases, the data will be deleted after 10 years from the end of the year in which we collected it.

11. Your Right according to the GDPR

In particular, you may have the following rights under the GDPR:

- **Right to information:** You have the right to request information at any time about whether we are processing personal data about you and, if so, to request information about that personal data. To exercise this right, you can contact us at any time using the contact details provided in clause 2.
- **Right to correction of your personal data:** When we process your personal data, we will endeavour to take reasonable steps to ensure that your personal data is accurate and up to date for the purposes for which it was collected. In the event that your personal data is inaccurate or incomplete, you may request this data to be corrected. To exercise this right, you can contact us at any time using the contact details provided in clause 2.
- **Right to erasure or restriction of processing:** Where applicable, you have the right to request the deletion of your personal data or the restriction of its processing. To exercise this right, you can contact us at any time using the contact details provided in clause 2.
- **Right to data portability:** Where applicable, you have the right to obtain the personal data concerning you, that you have provided to us, in a structured, commonly used and machine-readable format, or to transfer this data to another controller. To exercise this right, you can contact us at any time using the contact details provided in clause 2.
- **Right to object:** You have the right to object to the processing of your personal data at any time, insofar as we process your personal data for direct marketing purposes or insofar as we process your personal data for the pursuit of our legitimate interests and there are reasons arising from your particular situation. To exercise this right, you can contact us at any time using the contact details provided in clause 2.

- Right to withdraw consent: If our data processing is based on consent (pursuant to Art. 6 (1) (a) GDPR), you may revoke your consent at any time.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. To exercise this right, you can contact us at any time using the contact details provided in clause 2.

- Right to complain to a supervisory authority: You have the right to lodge a complaint with a supervisory authority within the European Union.

12. Amendment of this Privacy Notice

We reserve the right to revise and change this Privacy Notice regularly and to adapt it to our internal processes. Please visit our website regularly and view the current Privacy Notice applicable for customers and business partners. Moreover, the current version of this Privacy Notice is always provided with each new business transaction.

This Privacy Notice was updated on 1st April 2023.