

# General Privacy Policy for business partners

As part of our business relationship with you, it is essential that voestalpine High Performance Metals Schweiz AG processes your personal data. “Personal Data” means any information that refers either directly or indirectly to natural persons (such as names and e-mail addresses).

The protection of personal data is important to voestalpine High Performance Metals Schweiz AG, Hertistrasse 15, CH-8304 Wallisellen (hereinafter referred to as “we” and “us”). We observe the applicable legal regulations on the protection, lawful handling and confidentiality of personal data as well as data security, in particular the Swiss “New Data Protection Act” (nFADP) and the “EU General Data Protection Regulation” (EU GDPR).

Please find attached a summary of the processing of personal data of business partners:

## Categories of data, purpose of processing and legal basis

As part of our collaboration with business partners, we process personal data for the following purposes:

- Communicating with business partners regarding products, services and projects, e.g. to process enquiries from the business partner;
- Initiating, fostering and managing (contractual) business relationships and maintaining business relationships between us and the business partner, e.g. to process orders for products and services, collect payments, for accounting, billing and debt collection purposes and to carry out deliveries, maintenance activities or repairs;
- Conducting customer surveys, marketing campaigns, market analyses, sweepstakes, competitions or similar campaigns and events;

- Maintaining and protecting the security of our products and services and websites, preventing and detecting security risks, fraud or other criminal or malicious activities;
- Compliance with (i) legal requirements (e.g. retention obligations under tax and commercial law) and (ii) voestalpine guidelines; and
- Settling legal disputes, enforcing existing contracts and asserting, exercising and defending legal claims.

For the above purposes, we may process the following categories of personal data:

- professional contact information, such as your name, professional contact address, professional phone number or e-mail address;
- payment data, such as information required to process payment transactions or prevent fraud, including credit card information and card verification codes;
- information collected from publicly available sources, information databases or credit agencies; and
- other personal data, the processing of which is necessary for the initiation, processing and management of (contractual) business relationships as well as for the maintenance of business relationships, or which is provided voluntarily by you, such as orders placed, order details, enquiries made or project details, correspondence, other data about the collaboration.

The processing of personal data is necessary to achieve the aforementioned purposes, including the performance of a contractual relationship or pre-contractual activity with the business partner.

Unless expressly stated otherwise, the legal basis for data processing based on consent is Article 6, principles of the nFADP (New Data Protection Act) and/or Article 6(1) of the EU GDPR (European General Data Protection Regulation):

- processing is necessary for the performance of a contract to which the data subject is party or for implementing measures prior to entering into a contract;

- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

In the event of contradictory content of the aforementioned laws, Swiss law shall take precedence.

If the aforementioned personal data is not provided or not provided to the extent required or if we are unable to collect it, the individual purposes described may not be able to be fulfilled or the request(s) made may not be processed. Please note that this would not be considered a contractual non-performance on our part.

## Transmission and disclosure of personal data

Where legally permitted, we may transfer personal data to other voestalpine Group companies ([www.voestalpine.com/locations](http://www.voestalpine.com/locations)) or to courts, authorities, law firms or other business partners (such as shipping or logistics partners for the handling and processing of orders).

We also engage processors (service providers) to process personal data (e.g. as part of an IT support contract). These processors are contractually obliged to comply with data protection regulations.

The recipients described above may be located in countries outside the European Union (“third countries”) in which the applicable law does not guarantee the same level of data protection as in your home country. In this case, data will only be transferred in accordance with statutory requirements if the European Commission has issued an adequacy decision for the third country, appropriate safeguards have been agreed with the recipient (e.g. [standard EU contractual clauses](#) have been concluded), the recipient participates in an approved certification system (e.g. [data privacy framework](#)), binding internal data protection regulations in accordance with Art. 47 of the EU GDPR or an exception in accordance with Art. 49 of the EU GDPR (e.g. because you have expressly consented to the proposed data transfer after you have been informed of the potential risks of such transfers without an adequacy decision and without appropriate safeguards). Further information and a copy of the implemented measures can be obtained from the contact person indicated under “Contact persons”.

## Storage periods

If no explicit storage period is specified at the time of collection (e.g. as part of a declaration of consent), your personal data will be deleted provided it is no longer required to fulfil the purpose of the storage and no statutory retention obligations (e.g. retention obligations under commercial and tax law) or the assertion of legal claims prevent deletion.

## Right to access, rectification, erasure or restriction of your personal data, right to object, right to data portability and revocation of granted consent

- Pursuant to Article 15 of the EU GDPR, you have the right to obtain confirmation as to whether personal data is being processed by the controller and the right to access this data.
- According to Article 16 of the EU GDPR, you have the right to obtain without undue delay the rectification of inaccurate data concerning you and/or to have incomplete personal data completed.
- In accordance with Article 17 of the EU GDPR, you have the right to erasure of your personal data.
- In accordance with Article 18 of the EU GDPR, you have the right to restrict processing.
- In accordance with Article 20 of the EU GDPR, you have a right to data portability.
- In accordance with Article 21 of the EU GDPR, you have the right to object to data processing.
- Finally, you have the opportunity to lodge a complaint with the supervisory authority.
- If your data is processed on the basis of your consent, you have the right to revoke your consent at any time, without affecting the legality of the processing carried out on the basis of your consent prior to its revocation.

In order to ensure that such enquiries are dealt with efficiently, we ask you to contact us using the contact details below, whereby we always ask you to provide clear proof of your identity (e.g. by sending us an electronic copy of your identity document).

## Protection of your personal data

The security of your personal data is important to us. To protect your personal data from misuse and loss, unauthorised access, modification or disclosure, we take the following measures, among others:

- Controlled access to our premises
- Data access permissions (recording/control of access, modification and dissemination)
- General security measures to protect our company data network (access control, detection of intrusion attempts, firewall, anti-virus system, security patch mgmt.) We also impose our security requirements on the processors we engage, whom we have obliged to comply with similar or equivalent security precautions.

## Contact person

If you have any questions about data protection or wish to assert your aforementioned rights, please contact our data protection officer at [datenschutz.hpm-schweiz@voestalpine.com](mailto:datenschutz.hpm-schweiz@voestalpine.com).

This General Privacy Policy for Business Partners is amended from time to time. The date of the last update can be found in the footer.