

With the following information, we provide you as a business partner (customers, suppliers and interested parties) with an overview of the processing of your personal data by us and your rights under data protection law. Which data is processed in detail depends largely on the type and scope of the existing business relationship.

Please relay this information to current and future persons authorized to represent your company and to contact persons in your company.

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

The Controller (party responsible) for data processing: EUROPIPE GmbH
Sandstr. 140
45473 Mülheim an der Ruhr
Telefon: 0208/976-0

You can contact our Data Protection Officer at the aforementioned address and telephone number, as well as by email: datenschutz@europipe.com

2. Who uses the data and how do we collect it?

As part of the initiation and implementation of the business relationship, we process in particular the following categories of data of our business partners or their contact partners, which we have received directly from them or from other members of the group (MÜLHEIM PIPECOATINGS GmbH) or from other third parties (e.g. Schufa) in a permissible manner (e.g. for the fulfilment of contracts or on the basis of consent given). Furthermore, data that we have obtained from sources in the public domain (e.g. commercial registers, press, Internet) within the scope permissible is also processed:

Relevant personal data may be:

- Personal/contact data (e.g. first name, surname, company name, address, telephone number, telefax, email)
- Communication data in connection with correspondence (e.g. emails, letters)
- Contractual and billing data (e.g. bank details, goods ordered, data of invoice)
- Legitimation data (e.g. identification documents), authentication data (e.g. Authorization for signatures), Schufa (credit rating agency) score, credit bureaus, insurance company
- when accessing or using our IT applications: Log data (e.g. user ID, time stamp, type of access)

3. For what purpose is your data processed and on what legal basis?

The purpose of our company is the production and sale of large-diameter steel pipes for the transportation of liquid and gaseous media, as well as structural pipes including all related technical and commercial services. EUROPIPE GmbH processes data in the performance of this purpose in compliance with the provisions of the European General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and all further relevant laws (e.g. German Commercial Code - HGB, IFRS, German Fiscal Code - AO etc.).

a. For the performance of a contract or for pre-contractual measures (Art. 6 (1b)) GDPR)

Personal data are processed for the purpose of performing contracts with our business partners, in particular customers, suppliers and service providers. This also includes the performance of pre-contractual measures.

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

If necessary, we process your data beyond the actual performance of the contract with a view to safeguarding the justifiable interests of ourselves or of third parties.

Examples:

- For the reviewing and optimization of processes for analyzing requirements and for addressing the customer directly
- For advertising purposes and marketing/opinion research provided that you have not objected to the use of your data
- Assertion of legal claims and defense in litigation
- For ensuring IT security and IT operations
- For prevention and clearing up of crime
- For the protection of property, anti-theft system (e.g. monitoring)
- For access control...
- Assertion of legal claims and defense in litigation

c. On the basis of consent (Art. 6 (1 a)) GDPR)

If you have given us your consent to the processing of personal data for certain purposes (e.g. Newsletters), this processing complies with the requirement of lawfulness. Consent once granted can be revoked at any time with effect for the future. Please note that any revocation applies just to the future. Processing that took place before the revocation remains unaffected.

d. Based on statutory requirements (Art. 6 (1 c)) GDPR) or in the public interest (Art. 6 (1 e)) GDPR)

Moreover, we are subject to various legal obligations, i.e. statutory requirements, e.g. tax regulations., customs regulations, tax code....

4. Who is your data given to?

The departments in our company that require your data for the purpose of fulfilling our contractual and legal obligations and for the aforementioned purposes are provided with your data. Service providers and agents used by us may be given data for this purpose.

Data is only relayed outside the company if this is required by statutory provisions or if you have given your consent.

In turn, all recipients are themselves obligated to comply with data protection.

Assuming these preconditions, recipients of personal data may be the following:

- Public bodies and institutions (e.g. tax authorities, insurance company) on the grounds of a statutory or official obligation
- Processors to whom we relay personal data for the purpose of conducting the business relationship with you (e.g. support/maintenance of IT systems, data destruction, payments, bookkeeping, auditor, banks)
- Units with regard to which you have given us your consent for data transfer

No data is transferred to recipients in countries outside the EU or the EEA (so-called non-Member States).

If, in the individual case, data is to be transferred to non-Member States, this is either necessary for performing a contract, takes place in the context of processing a contract, is mandatory under the law or is based on consent that you have granted to us. If service providers in a non-Member State are used, an appropriate level of data protection is guaranteed.

5. How long is your data stored for?

We process and store your personal data only as long as it is required for the fulfillment of the purposes cited under Item 3. It should be noted here that many of our business relationships are long term.

If the data is no longer required for the performance of contractual or statutory obligations, it will regularly be erased unless this data is necessary for further temporary processing for the following purposes:

- Compliance with retention periods under commercial and fiscal law, e.g. German Commercial Code or Fiscal Code that define the periods of retention as two to ten years.
- Preservation of proof in the context of the statute of limitations (e.g. Sections 195 et seq. German Civil Code (BGB)).

6. What are your data protection rights?

All persons affected (data subjects) have the right to information pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to erasure pursuant to Art. 17 GDPR, the right to restriction on the processing pursuant to Art. 18 GDPR, the right to objection based on Art. 21 GDPR and the right to data portability pursuant to Art. 20 GDPR. The restrictions under Sections 34 and 35 of the German Federal Data Protection Act apply to the right to information and the right to erasure. Moreover, there is a right to lodge a complaint with the competent data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 of the German Federal Data Protection Act).

You can revoke any consent granted for the processing of personal data at any time. This also applies to the revocation of declarations of consent that we were granted before the GDPR took effect, i.e. before May 25, 2018. Please note that any revocation applies just to the future. Processing that took place before the revocation remains unaffected.

7. Is there any obligation for you to provide data?

Within the scope of our business relationship, you must provide personal data required for the initiation and conducting of a business relationship and compliance with the associated contractual obligations, or data which we are required to collect under the law.

8. Is there automatic decision-making (including profiling)?

No use is made of automatic decision-making or profiling.

9. Information on your right to object pursuant to Art. 21 GDPR

1. Case-by-case right to object

You have the right to object at any time for reasons arising from your particular situation against the processing of your personal data that is carried out based on Art. 6 (1 e) GDPR (data processing in the public interest) and Art. 6 (1 f) GDPR (data processing on the basis of balancing of interests). If you lodge an objection, we will no longer process your personal data unless we can provide proof of compelling legitimate grounds for processing that override your interests, rights and freedoms, or if the processing serves the purpose of the establishment, exercise or defense of 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. They objection can be made informally by email to europipe@europipe.com.