

# Data privacy notices pursuant to the EU General Data Protection Regulation for Business Partners and Interested Parties and their Contacts



The information below is intended to give you an overview of how we process your personal data and your rights under the data protection law. Which data are specifically processed depends mainly on the type and scope of the existing business relationship. Further data protection notices may be relevant for you, e.g., if you visit our website or use IT applications provided by us.

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

The Controller (party responsible) for data processing:

DEUMU Deutsche Erz- und Metall-Union GmbH  
Gerhard-Lucas-Meyer-Straße 3-5  
31226 Peine

You can contact our **Data Protection Officer** at the above-mentioned address as well as by email: [datenschutz@deumu.de](mailto:datenschutz@deumu.de)

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

As part of informing about our business development and the initiating and conducting of business relations, we process the following data categories of our business partners and their contacts. We obtain this data directly from these partners or from other Salzgitter Group companies or from other parties within the scope permissible (e.g. for the performance of contracts or based on consent granted). 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, address, telephone number, fax, e-mail)
- Communication data in connection with correspondence (e-mails, correspondence)
- Contract and billing data (e.g. bank details, goods ordered, invoice data)
- Identification data (e.g. identity documents), authentication data (e.g. specimen signature)
- 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 object of our business is trading, processing and recycling of raw materials. The main emphasis of our broad international business activities is on dealing with raw materials used in the production of steel: scrap metals, metals and alloys. Our broad range of activities is complemented by offering a range of services. Data is processed for the purpose of performing the aforementioned tasks pursuant to the provisions defined under the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG) as well as all other pertinent laws (e.g. German Commercial Code – HGB), German Fiscal Code (Abgabenordnung – 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 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 (1f)) 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
- Assertion of legal claims and defense in litigation
- For ensuring IT security and IT operations
- For the prevention of crime
- For property protection, theft protection (video)

### c. Based on consent (Art. 6 (1a)) 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. 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.

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## 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.

### 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 above-mentioned 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) 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)
- 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).

### 5. How long is your data stored for?

We process and store your personal data for as long as is necessary to fulfill the purposes stated in section 3. Please note that our business relationship is generally 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.

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

#### 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.