

Data protection declaration for business partners

This data protection declaration for business partners will inform you about the processing of your personal data at Leifeld Metal Spinning GmbH, its subsidiaries, affiliates, departments and groups, in accordance with Article 13 of the General Data Protection Regulation (GDPR).

Your personal data includes all information that relates or is related to you as a person, pursuant to Article 4 lit. 1 of the GDPR, in particular by means of assigning an identifier such as a name or an organization number or a customer number with which you as a person can be identified.

We are providing this data-protection information to business partners ("**Notification**") as the responsible body to explain the data processing procedure as it relates to our suppliers, customers and business partners (collectively, the "**Business Partners**") and their employees who are affiliated with Leifeld Metal Spinning GmbH.

Scope:

This Notification shall apply if you are an independent Business Partner of Leifeld Metal Spinning GmbH (e.g. a supplier, service provider, customer, shareholder or consultant) or if you are an employee of a Business Partner who is acting on behalf of the Business Partner with Leifeld Metal Spinning GmbH.

Categories of personal data and data sources:

Leifeld Metal Spinning GmbH will process the following personal data in connection with your company or third parties (e.g. your supervisor, authorities or public resources):

- **Personal data relating to independent Business Partners:** name, business contact information, offered services or products, contractual information, communication content (such as e-mails or business letters), payment information, billing information and business relationship history
- **Personal data relating to a Business Partner's employees:** name, business contact details, name of the employer, title/position, and communication content (such as e-mails or business letters)

Data processing purposes, legal basis, and consequences:

Your personal data will be processed for the purposes of fulfilling the contractual relationships with the Business Partner (including the fulfillment of contractual obligations, invoice processing, communication, and adhering to legal requirements) for marketing and CRM activities, and for fraud prevention.

Leifeld Metal Spinning GmbH draws on the following legal bases with regard to data processing:

- Fulfillment of the contractual relationship with the Business Partner (Article 6, lit. b of the GDPR);

- Legitimate interest of Leifeld Metal Spinning GmbH or its subsidiaries or third parties (e.g. public authorities or courts) (Article 6, lit. f of the GDPR). The legitimate interest may be, in particular, the group-wide exchange of information, marketing and CRM activities, fraud prevention, IT abuse, money laundering, operation of a whistleblowing system, physical security, IT and network security, internal investigations or even potential mergers and takeover activities
- Consent (Article 6, lit. a of the GDPR);
- Fulfillment of legal obligations (Article 6, lit. c of the GDPR);
- Legitimate interest of the responsible body, unless this is outweighed by the interests or basic rights and freedoms of the affected person, requiring the protection of personal data (Article 6, lit. f of the GDPR); The provision of personal data is required for the conclusion and/or execution of the Business Partner Agreement and is voluntary. However, if you do not provide this data, it could delay the Business Partner management and administrative processes or even make them impossible.

Recipient Categories:

Leifeld Metal Spinning GmbH may use service providers who will act as processors to provide them with IT and other administrative support (e.g. service providers that provide support for the accounts payable department or IT hosting and maintenance support). These service providers may have access to your personal data if this is necessary for the provision of such services.

Any access to your personal data will be restricted to the people who need the information to complete their tasks.

Leifeld Metal Spinning GmbH may disclose your personal data if required or demanded by governmental authorities, courts, external authorities or similar third parties.

Retention period:

The personal data will be stored by Leifeld Metal Spinning GmbH and our service providers for as long as necessary - until our obligations have been fulfilled. The data will be saved for this purpose for as long as necessary, pursuant to the applicable data protection law. As soon as Leifeld Metal Spinning GmbH no longer requires the data to fulfill its contractual or legal obligations, it will be removed from our systems and records and/or measures will be taken to properly anonymize your personal information so that you will no longer be identifiable. That is unless we must retain your personal data in order to comply with the legal or regulatory obligations that Leifeld Metal Spinning GmbH is subject to, e.g. legally required retention periods under the German Commercial Code and the German Tax Code, which are usually between 6 and 10 years, or if we must secure evidence within a statutory period of limitation, which is normally 3 years but can be as long as 30 years.

Your rights:

If you have given your consent to certain processing activities, you may revoke it at any time with future effect. This revocation will not affect the prior processing of your data.

In accordance with applicable data protection laws, you will have the right: a) to inspect your personal data; b) to rectify your personal data; c) to request the deletion of your personal data; d) to demand restrictions on the processing of your personal data; e) to request the transfer of your personal data; f) to object to the processing of your personal data. Note that the above rights may be restricted by national law.

a) **Right to information:** You will have the right to receive confirmation from us on whether we will process your personal data and you will be able to gain access to this data. The access information will include, among other things, the purpose of the processing, the categories of personal data, the affected people, and the recipients or categories of the recipients. However, this is not an absolute right and the interests of others may limit your right of access. You will have the right to receive a copy of the personal data that is being processed. We will have the right to charge a reasonable fee for the administrative costs if you request further copies.

b) **Right to deletion (right to be forgotten):** Under certain circumstances, you will have the right to delete any personal information that concerns you.

c) **Right to limited processing:** Under certain circumstances, you will have the right to restrict us from processing your personal data. Under these circumstances, the respective data will be marked and only processed for a specific purpose.

d) **Right to transfer data:** Under certain circumstances, you will have the right to obtain the personal data that has been provided by you in a structured, frequently-used, and machine-readable format, and you will be entitled to transfer this data to another company without hindrance.

You will also have the right to lodge a complaint with the relevant supervisory authority.

Right to object pursuant to Article 21 of the General Data Protection Regulation

The affected person shall have the right to object to the processing of personal data concerning him or her at any time, for reasons arising from his/her particular situation under Article 6, paragraph 1, points (e) or (f). Since Leifeld Metal Spinning GmbH will process and use your personal data primarily for the purposes of the contractual relationship with you, Leifeld Metal Spinning GmbH basically has a legitimate interest in processing your data. This will, however, counteract your request for restriction.

To exercise this right, please contact us as mentioned in the "Questions" section. Leifeld Metal Spinning GmbH does not carry out any automatic decision-making processes.

Questions:

If you have any questions regarding the Notification or your rights, please contact **datenschutz@leifeldms.com**.

The data protection officer at Leifeld Metal Spinning GmbH can be reached via the contact details below:

BITsic -Datenschutz und Informationssicherheit-

Mr. Paul Köhler

Untere Kampstraße 12

33181 Fürstenberg (Germany)

Phone: +49 2953 99244

Fax: +49 2953 99245

Cellphone: +49 175 2206923

E-Mail: paul.koehler@bitsic.de

Internet: www.bitsic.de