



**thyssenkrupp**

## **Information for suppliers**

Data protection - thyssenkrupp Steel Europe AG  
March 2021

# Information on the processing of personal data within the scope of the business relationship with suppliers

## 1. What information does this document contain for you?

thyssenkrupp Steel Europe AG ("we") has a business relationship with you or your employer/client, e.g. the initiation or execution of a contractual relationship as part of our business activities.

We ensure that we meet the requirements of the applicable data protection laws. In the following we give you a detailed overview of our handling of your data and your rights.

## 2. Who is responsible for processing and who is the data protection officer?

**Responsible** for the processing is

thyssenkrupp Steel Europe AG  
Kaiser-Wilhelm-Straße 100  
47166 Duisburg

You can reach our **data protection officer** at

Data Protection Officer  
thyssenkrupp Steel Europe AG  
Kaiser-Wilhelm-Straße 100  
47166 Duisburg  
Telefon 0203 52 23912  
E-Mail: [datenschutzbeauftragter-seag@thyssenkrupp-steel.com](mailto:datenschutzbeauftragter-seag@thyssenkrupp-steel.com)

## 3. Which categories of data do we process and where do they come from?

We process personal data that you provide to us within the scope of the business relationship. If we have a business relationship with your employer or client, we will also collect personal data from you or from your employer or client. These are the following data or categories of data:

- Master data (e.g. name and salutation, title, function title/position description)
- contact details (e.g. telephone number, fax number, e-mail address, address)
- Communication data (e.g. contents of personal, telephone or written communication)
- offer data
- Factoryaccess data
- billing information

#### 4. For what purposes and on what legal basis is data processed?

We process your data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and all other relevant laws.

We process personal data primarily for the purpose of fulfilling contractual obligations (Art. 6 Para. 1 lit. b GDPR), more precisely for the purpose of initiating, executing or fulfilling a contract. These are for example the task of orders, the entry of offers and achievements, the incoming in-voice processing or contract negotiations.

If you are not a contractual partner yourself - such as an employee of a business partner - processing is carried out for the same purposes as a legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. We are in the process of initiating or implementing a contractual relationship with your employer/client within the framework of our business activities. Due to your activity for your employer/client, we process your personal data for this purpose.

If necessary, we also process personal data to comply with legal requirements (Art. 6 para. 1 lit. c GDPR) for the following purposes:

- Compliance with legal storage obligations
- Compliance with legal reporting obligations

In addition, we process personal data to safeguard the following legitimate interests (Art. 6 para. 1 lit. f GDPR):

- Maintenance of the business relationship
- Assertion of legal claims and defence in legal disputes
- Entry into our contact database, contact maintenance after business contact (e.g. after surrender of your business card)
- Information letters to suppliers

We may also process personal data for which we have been given consent (Art. 6 para. 1 lit. a GDPR). We will obtain these separately and in the following cases:

- Personal data for access to tk Steel Sourcing and service recording platform as well as Ariba/PRONET

#### 5. Who gets your data?

Your data will be processed within thyssenkrupp Steel Europe AG by the employees involved in the initiation/execution of the business relationship and the execution of the respective business processes.

Within our group of companies, your data will be transferred to certain companies if these companies perform data processing tasks for the affiliated companies in a centralised manner (e.g. centralised contact data management, centralised contract management, processing of tenders, negotiations and orders, central provision of an electronic catalogue ordering process, processing of incoming invoices, disposal of files).

In addition, in order to fulfil our contractual and legal obligations, we make use of various external service providers, some of whom are bound by contract processing agreements under data protection law, Art. 4 No. 8 GDPR. These are service providers in the following areas 4:

- IT services
- logistics

In addition, we transmit your data to other recipients outside the company who process your data under their own responsibility, Art. 4 No. 7 GDPR. These could be, for example, the following categories of responsible persons:

- Public authorities due to legal regulations (e.g. tax authorities)
- Third parties such as credit institutions, credit agencies - insofar as a transfer is permissible for legitimate interests, e.g. in the context of obtaining economic information.
- Suppliers in the context of the transmission of tender documents and purchase orders
- Third parties such as market research institutes or other institutional bodies within the framework of maintaining business relationships

## 6. How long is your data stored?

We process your personal data for as long as it is necessary for the above purposes. After termination of the business relationship, your data will be stored as long as we are legally obliged to do so. This regularly results from legal obligations to provide evidence and to retain records, which are regulated in the German Commercial Code and the German Tax Code (Abgabenordnung). The storage periods are then up to ten years. In addition, it may be necessary for personal data to be retained for the period during which claims may be asserted against us (statutory limitation period of up to thirty years)

## 7. Are you obliged to provide your data?

There is no contractual or legal obligation to provide personal data. However, without processing your personal data, we are not in a position to carry out the necessary pre-contractual measures or the contractual relationship with you or your employer/client.

## 8. What data protection rights can you assert as a data subject?

You have the right to request **information** about your personal data stored, Art. 15 GDPR. In addition, you can request the **correction** or **deletion** of your data, Art. 16, 17 GDPR. You may also have **a right to limit the processing of** your data and **a right to have the data provided by you published** in a structured, common and machine-readable format, provided that the rights and freedoms of other persons are not affected thereby, Art. 18, 20 GDPR.

If you have given us permission to process your personal data, you can **revoke** this permission **at any time**. The lawfulness of the processing carried out on the basis of the consent until revocation remains unaffected by this.

In order to exercise these rights, please contact the responsible body or data protection officer referred to in point 2.

You also have the **right to object**, which is explained in more detail at the end of this data protection notice. 5.

You also have the option of lodging a **complaint with a data protection supervisory authority**, Art. 77 GDPR. The right of appeal shall be without prejudice to any other administrative or judicial remedy. The data protection supervisory authority responsible for us is:

The State Commissioner for Data Protection and Freedom of Information North  
Rhine-Westphalia  
Kavalleriestrasse 2-4  
40213 Düsseldorf  
<http://www.ldi.nrw.de>

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**Information about your right of objection according to Art. 21 General Data Protection Regulation (GDPR)**

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data on the basis of Article 6(1)(f) of the GDPR (data processing based on a balancing of interests); this also applies to any profiling based on this provision within the meaning of Article 4(4) of the GDPR.

If you file an objection, we will no longer process your personal data unless we can prove compelling reasons for the processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

The objection can be made without form and should preferably be addressed to the responsible body or data protection officer mentioned in the data protection declaration under point 2.