

Information letter on data protection for business partners

The protection of your data is a high priority for Schwäbische Hüttenwerke Automotive GmbH ("SHW GmbH").

With the following information we inform you which personal data we collect within the scope of our supply relationship and for which purposes we process these data.

I. Name and contact details of the person responsible for processing and of the data protection officer

SHW GmbH is responsible for the processing of personal data:

Schwäbische Hüttenwerke Automotive GmbH
Wilhelmstraße 67, 73433 Aalen-Wasseraffingen
Phone: 07361-502-448

The data protection officer of SHW GmbH can be contacted as follows:

Company data protection officer
Schwäbische Hüttenwerke Automotive GmbH
Wilhelmstraße 67, 73433 Aalen-Wasseraffingen
Phone: 07361-502-448
E-Mail: datenschutz@shw.de

II. Contract-related data processing

Within the framework of the contract initiation or at contract conclusion we collect personal data of the business partners (e.g. customers, suppliers, providers of other deliveries and/or services, cooperation partners) or of the contact persons designated by them, in particular surname and first name as well as contact data (telephone number, e-mail address, fax) of the business partner or the contact persons. In addition, we collect all information that is necessary for the execution of the contractual relationship as well as for the execution of the business transactions.

We process the data collected by us for the purposes of checking the conclusion of the contract and deciding on the acceptance of the contract, processing the transactions, issuing invoices, defending or processing any liability claims and asserting any claims of our own arising from the business relationship.

The legal bases of the processing are:

- - Art. 6 para. 1 sentence 1 letter b) DSGVO: The processing of your data is necessary for the acceptance and processing of the contract as well as for the fulfilment of the mutual obligations from the contract.

- Art. 6 para. 1 sentence 1 letter f) DSGVO: The processing of your data is necessary to safeguard our legitimate interests, in particular to assert or defend against legal claims arising from the business relationship.

The personal data collected by us will only be stored for as long as is necessary to achieve the purpose for which the data was collected. This is usually no longer the case if the contractual relationship has been concluded and possible warranty claims have expired and we are not obliged to store the data beyond this due to storage obligations resulting from industry-specific requirements or from tax and commercial law regulations or if we have not expressly agreed to store the data beyond this in accordance with Art. 6 Para. 1 Sentence 1 Letter a) DSGVO.

Personal data will only be published on our homepage as part of reporting on individual business partners if the persons concerned have expressly consented thereto.

III. Data processing for direct marketing purposes

We reserve the right to process personal data provided to us within the framework of the business relationship - i.e. surname, first name, postal address and any other information voluntarily provided to us (e.g. position, industry) - in order to send our business partners invitations to events relevant to them (e.g. SHW GmbH) and information on new developments in the automotive industry by letter post. The legal basis for this is Art. 6 para. 1 letter f) DSGVO.

We will only use the e-mail address provided to us for direct marketing purposes if the person concerned has expressly consented to this. The legal basis for this is Art. 6 para. 1 letter a) DSGVO.

Each business partner or contact can object to the processing of his personal data for the purposes of direct marketing at any time free of charge and with effect for the future by sending a message to the contact data listed under item I. or via a link provided for this purpose in an e-mail sent by us or revoke his consent to this.

IV. Transfer of personal data to third parties

A passing on of personal data to third parties does not take place - as far as not indicated before - in principle. In particular, we do not pass on personal data to recipients domiciled outside the European Union or the European Economic Area, unless such transmission is necessary in connection with the processing of a contractual relationship or to carry out the business relationship.

Insofar as this is required under Art. 6 Para. 1 Sentence 1 Letter b) DSGVO for the processing of a contractual relationship or for the execution of the business transaction, we shall not be liable for any loss or damage arising out of or in connection with the processing of the contractual relationship or the performance of the business transaction.

To some extent, we use the services of external service providers to process personal data within the framework of order processing pursuant to Art. 28 DSGVO (e.g. in the area of IT services, translations or data carrier disposal). These service providers have been carefully selected and commissioned by us, are bound by our instructions and are checked regularly.

If necessary in exceptional cases and only within the framework of legal regulations, personal data is passed on to supervisory and criminal prosecution authorities to the extent necessary to comply with legal or official requirements or to prevent and detect fraud and other criminal offences. The legal bases for this are Art. 6 Para. 1 Letters c) and f) DSGVO.

V. Rights of data subjects

Insofar as we process personal data, the persons concerned are entitled to the following rights:

Where processing is based on Art. 6 para. 1 letter f) DSGVO ("legitimate purposes"), the data subject may object to the processing of his/her personal data in accordance with Art. 21 DSGVO. The processing of personal data for advertising/marketing purposes can be objected to at any time - without stating reasons. The data concerned will then no longer be processed for advertising/marketing purposes.

Insofar as personal data has been provided to us on the basis of consent, the persons concerned have the right to revoke their consent under data protection law at any time without stating reasons by sending a message to the office named under I. This applies in particular to **consent** to the processing of personal data for e-mail and telephone marketing. The revocation of the consent does not affect the legality of the processing carried out on the basis of the declared consent up to the revocation.

In addition, the persons concerned may exercise the following rights if the respective legal requirements are met:

- Right to information on the processing of personal data concerning them, on the processing purposes, the categories of data and their origin if the data were not collected directly, the categories of recipients of personal data, the planned storage period and the rights of data subjects;
- Right to rectification of inaccurate or incomplete personal data;
- Right to cancellation of personal data, in particular if the data is no longer necessary for the purpose for which it was collected and we are not obliged to store the data due to legal or contractual requirements;
- Right to limit the processing of personal data;
- Right to data transfer with regard to the personal data provided to us by the person concerned in a common, machine-readable format or to transfer this data to another responsible person.

Data subjects also have the right to lodge a complaint with a supervisory authority. The address of the supervisory authority responsible for us is:

State Commissioner for Data Protection and Freedom of Information Baden-Württemberg (LfDI):
Postfach 10 29 32, 70025 Stuttgart, Germany, Phone: 0711 / 615541-0, FAX: 0711/615541-15, E-Mail:
poststelle@lfdi.bwl.de.

VI. Data security

We take appropriate technical security measures to protect the data entrusted to us from loss, destruction, disclosure and access by unauthorised persons and always adapt these to technical developments. However, we would like to point out that the transmission of data on the Internet (e.g. communication by e-mail) can be subject to security gaps. A complete protection of the data against access by third parties is not possible.

VII. Adjustments to data protection information

We will revise our information on the processing and protection of your personal data from time to time in order to adapt it to the state of the art or to changed general conditions. We therefore recommend that you inform yourself regularly about changes on our website.