

Data protection information in accordance with the EU General Data Protection Regulation for business partners and Interlocutors.

The following information provides you with an overview of the processing of your personal data by us and your rights under data protection legislation. The data processed depends mainly on the type and extent of the existing business relationship.

Please also transfer this information on to the persons authorised to represent the company and to your company's current and future contacts.

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

The responsible entity is:

Mannesmann Precision Tubes France SAS
Z.I. Sud la Saunière
89600 Saint-Florentin
Phone Number: +33 3 86 43 50 50

You can contact our **data protection officer** at the address and telephone number mentioned above or by e-mail at the following address: dpo.mptfr@mannesmann.com

2. What data do we use and how do we collect it?

In the context of establishing and executing the business relationship, we process in particular the following categories of data of our business partners or their contact persons, which we have obtained directly from them or other companies of the Salzgitter Group or other third parties in an authorised manner (e.g. for the performance of contracts or on the basis of consent given). On the other hand, we process data that we have collected in an authorised manner from publicly accessible sources (e.g. commercial register, press, internet):

Interested persons	<ul style="list-style-type: none"> ▪ Personal/contact data (e.g. first name, last name, company, address, (mobile) telephone number, fax number, email address) ▪ Communication data in connection with correspondence (emails, mail)
Customers Suppliers Providers of Services	<ul style="list-style-type: none"> ▪ Personal/contact data (e.g. first name, last name, company, (mobile) telephone number, fax number, e-mail, vehicle registration number when accessing our sites) ▪ Contract and billing data (e.g. bank details, goods ordered, billing data) ▪ Communication data in connection with correspondence (emails, mail)
Members of Boards Representatives subsidiaries and employees of Salzgitter	<ul style="list-style-type: none"> ▪ Personal/contact data (e.g. first name, last name, company, (mobile) telephone number, fax number, e-mail, vehicle registration number if accessing our production sites) ▪ Communication data in connection with correspondence (emails, mail) ▪ Participation in internal group events

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

The purpose of our company is the manufacture and distribution of precision steel tubes and tubular products as well as all related technical and commercial services. Data processing is carried out within the framework of these purposes and in compliance with the provisions of the EU General Data Protection Regulation (GDPR), Law No. 78-17 of 6 January 1978 on Information Technology, Data Files and Civil Liberties (LL) and all other applicable laws (e.g. the French Commercial Code, etc.).

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

The processing of personal data is primarily used for the performance of contracts with our customers, suppliers, and service providers. This also includes the execution of pre-contractual measures at the request of the business partner.

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

If necessary, we process your data beyond the actual performance of the contract to safeguard our legitimate interests or those of third parties.

Examples:

- Review and optimization of the procedures for analysing needs and directly approaching customers.
- Market and opinion research, insofar as you have not objected to the use of your data.
- Assert one's rights and defend oneself in the event of a dispute.
- Ensure the security and operation of IT.
- Prevention of crimes
- Video surveillance for the protection of objects as well as for the prevention and prosecution of crimes and the preservation of property rights.
- Building and facility security measures (e.g., access control, access authorization).

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

Insofar as you have given us your consent to the processing of personal data for specific purposes (e.g. for the newsletter), the lawfulness of this processing is ensured based on your consent. The consent given may be revoked at any time with future effect. This also applies to the revocation of declarations of consent given to us before the GDPR came into force, i.e. before 24 May 2018. Processing that took place before the revocation is not affected.

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

In addition, we are subject to various legal obligations, i.e. legal requirements, e.g. tax and customs regulations.



4. Who receives your data?

Within our company, the departments that have access to your data are those that need it to fulfil our contractual and legal obligations or the purposes mentioned above. The service providers and vicarious agents we use may also receive data for this purpose. Data may be transmitted within the Group for internal administrative management purposes in the context of the preservation of our legitimate interests. All recipients are obliged to comply with data protection regulations. Under these conditions, the recipients of personal data may be:

- Public departments and institutions (e.g. financial authorities) in the event of a legal or administrative obligation.
- Processors to whom we transmit personal data for the performance of the business relationship with you (e.g. support/maintenance of IT facilities, data destruction, payment transactions, accounting).
- The services for which you may have given us your consent for the transmission of data.
- Subsidiaries or service providers involved in the performance of the contract.

The transfer of data outside the EU or EEA (third countries) only takes place if it is necessary for the performance of the contract and/or required by law if you have given us your consent or in the context of order processing. If service providers are engaged in a third country, an appropriate level of data protection is guaranteed.

5. How long is your data kept?

We process and store your personal data for as long as it is necessary to achieve the purposes mentioned in point 3. It should be noted that our business relationship is usually focused on the long term.

The data processed for the purposes of customer relationship management are kept for the duration of the contractual relationship, increased by five (5) years from the end of the contractual relationship.

The data processed for the purposes of commercial prospecting are kept for three (3) years from the last contact with the person concerned.

Accounting records are kept during the current financial year, increased by ten (10) years from the end of the financial year.

6. What are my data protection rights?

Every data subject has the right to **be informed** in accordance with Article 15 of the GDPR, the right to **rectification** in accordance with Article 16 of the GDPR, the right to **erasure** in accordance with Article 17 of the GDPR, the right to **restriction of processing** in accordance with Article 18 of the GDPR, the right to **objection** in accordance with Article 21 of the GDPR, as well as the right to **data portability** in accordance with Article 20 of the GDPR. You can also set guidelines for the retention, deletion and disclosure of your personal data after your death.

You can revoke your consent to the processing of personal data with us at any time. This also applies to the revocation of declarations of consent sent to us before the GDPR came into force, i.e. before 24 May 2018. Processing carried out before the revocation is not affected.

To exercise your rights, you can contact us:

- by email to: dpo.mptfr@mannesmann.com
- Or by mail to the following address:

Mannesmann Precision Tubes France SAS
Z.I. Sud la Saunière
89600 Saint-Florentin

Please tell us the purpose of your request and the right(s) you intend to claim. If you have reasonable doubts about your identity, you may be asked to provide proof of identity.

If, after contacting us, you believe that your rights are not respected, you can file a complaint with the CNIL.

7. Am I required to provide data?

In the context of our business relationship, you must provide personal data that is necessary for the establishment and performance of a business relationship and the performance of contractual obligations related to it or that we are legally obliged to collect.

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

Automatic decision-making or profiling are not used.