

**Data Processing Policies of InfraLeuna GmbH and its Subsidiaries  
Information for Business Partners Concerning the Collection of Data Pursuant to GDPR  
Articles 13 and 14**

We are committed to protecting our business partners' personal data. As required by General Data Protection Regulation (GDPR) Article 12 et seq., we have provided our information on data privacy below:

**Who is in control of data processing?**

The controller for purposes of data protection law is:

InfraLeuna GmbH  
Am Haupttor, Bau 4310  
06237 Leuna  
Germany

[datenschutz@infraleuna.de](mailto:datenschutz@infraleuna.de)

You can learn more about our company, its authorized representatives and other contact options in the Imprint section of our website: <https://www.infraleuna.de/en/imprint/>.

**Do you have a data protection officer?**

Yes, we have appointed a data protection officer at our company. You can contact our officer at:

[datenschutz@infraleuna.de](mailto:datenschutz@infraleuna.de)

You can also send regular mail to our data protection officer at the above address.

**What data of yours do we process, and where do we get this data from?**

We process the following personal data that we obtain from you in the course of our business relationship:

- Company name including legal structure and address
- Contact details such as first and last name, title, department, position, work phone numbers, mobile phone numbers, fax numbers and e-mail addresses
- Payment data (details required for payment processing or fraud prevention)
- Other information that has to be processed for a project or to fulfill a contractual relationship with InfraLeuna or that has been voluntarily shared by our contacts

We process data lawfully received from third parties as needed to provide our services or in the context of our business relationships. We also process data lawfully obtained or extracted from public sources that we are legally authorized to process.

**What are the purposes and legal bases for processing your data?**

We process personal data in compliance with the provisions of the EU's General Data Protection Regulation and the German Federal Data Protection Act (BDSG). We will only process data received from you for the purposes for which we have received or collected it:

**For the performance of a contract (GDPR Article 6(1) point (b))**

The data is processed for the performance of:

- Our contract (initiation, performance and management) and ancillary services (communication with business partners regarding products, services and projects, e.g. in order to respond to the business partner's inquiries)
- Steps prior to entering into a contract (e.g. storing data from business cards in order to possibly initiate a future business relationship)

### **For compliance with a legal obligation (GDPR Article 6(1) point (c)):**

We have multiple legal obligations that require data processing. They include, without limitation:

- Tax and accounting laws
- Responding to inquiries and requests from regulators or public prosecutors
- Satisfying tax monitoring and reporting obligations

Personal data may also have to be disclosed in connection with court or administrative proceedings for the purposes of collecting evidence, prosecuting crimes or enforcing civil claims.

### **For the purposes of a balancing of interests (GDPR Article 6(1) point (f)):**

Where necessary, we will process your data beyond the actual performance of the contract for the purposes of balancing the interests that we or a third party may pursue. This includes situations such as:

- Enforcing legal claims and presenting a defense in a legal dispute
- Processing in the CRM system

If we process data based on a balancing of interests, you as the data subject have the right to object to the processing of personal data, subject to the requirements of GDPR Article 21.

Pursuant to GDPR Article 6(1) point (a), we may also process personal data if you have given us your consent to do so.

We will only process personal data for other purposes if the legal requirements of GDPR Article 6(4) have been met. In this case, we will obviously comply with any information obligations of GDPR Article 13(3) and GDPR Article 14(4).

### **How long is the data stored?**

We process and store your personal data for as long as we require it to meet our legal and contractual obligations. The data is regularly deleted once we no longer require it to meet our legal or contractual duties.

Exceptions are made in order to:

- Meet statutory retention obligations under the Commercial Code (HGB), German Tax Code (AO) or similar laws. These laws generally stipulate retention and/or documentation periods of six to ten years.
- Preserve evidence for the duration of statutory limitation periods. According to German Civil Code (BGB) § 195 et seq., limitation periods can run up to 30 years although three years is the standard duration.

Personal data processed in our or a third party's legitimate interest will be deleted as soon as this interest no longer applies. The specified exceptions apply.

### **With whom do you share data?**

#### **- At our company:**

At our company, your data is made available to units that need it to fulfill our legal and contractual obligations (including steps prior to entering into a contract).

#### **- In processor situations:**

Where applicable, we transfer your data to service providers who work for us as processors (e.g. IT services).

All service providers are bound by contract and specifically obligated to treat your data in confidence.

#### **- Other third parties**

Data transfers to recipients outside our company always comply with applicable data protection requirements. Recipients of personal data may include, without limitation:

- Public bodies and institutions (e.g. tax authorities and public prosecutors) where required by law or an administrative order
- Credit and financial service providers (payments processing)
- Tax advisors, tax examiners, payroll tax auditors and certified public accountants (statutory audit mandate)

### **Does data get transferred to third countries?**

Your data is only processed in the European Union and in European Economic Area (EEA) member states.

### Your rights as the data subject

The law gives you, the data subject, the following rights, which you can assert against us:

- **Right of access:** Under GDPR Article 15, you have the right, at any time, to obtain confirmation from us as to whether or not we process personal data concerning you; where this is the case, GDPR Article 15 also gives you the right to obtain access to this personal data and certain other information (including the purposes of the processing, the categories of personal data, the categories of recipients, the planned retention period, the source of the data, the use of automated decision-making and, in case of a transfer to a third country, the appropriate safeguards) as well as a copy of your data.
- **Right to rectification:** Under GDPR Article 16, you have the right to demand that we rectify your personal data that we have stored if this data is inaccurate or incomplete.
- **Right to erasure:** Under the grounds set out in GDPR Article 17, you have the right to demand that we immediately erase the personal data concerning you. The right to erasure does not apply if the processing of personal data is necessary (i) to exercise the freedom of expression and information; (ii) to comply with a legal obligation imposed on us (e.g. legal retention obligations); or (iii) for the establishment, exercise or defense of legal claims.
- **Right to restriction of processing:** Under the grounds set out in GDPR Article 18, you have the right to demand that we restrict the processing of your personal data.
- **Right to data portability:** Under the grounds set out in GDPR Article 20, you have the right to demand that we hand over to you the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format.
- **Right of withdrawal:** You have the right to withdraw your consent to the processing of personal data at any time with effect for the future.
- **Right to object:** Under the grounds set out in GDPR Article 21, you have the right to object to the processing of your personal data, which means that we will have to stop processing your personal data. The right to object only applies within the limits set out by GDPR Article 21. Furthermore, our interests may interfere with the termination of processing, which means that we still have the right to process your personal data despite your objection.

### Do I have a right to complain?

You have the right to lodge a complaint with a data protection supervisory authority about our processing of personal data (GDPR Article 77 in conjunction with BDSG § 19).

### Does automated individual decision-making, including profiling, take place?

No. There is no automated individual decision-making or profiling.

### Is there a duty to provide data?

In a contractual relationship, you will have to provide the personal data required to initiate, perform and terminate the contract and to fulfill all associated contractual obligations or the personal data we are required by law to collect. Without this data, we will generally not be able to enter into or perform a contract with you.