

DATA PROTECTION INFORMATION FOR THE CUSTOMER

(last updated 23.05.2018)

GENERAL

The trustworthy and responsible handling of personal data is a central component of the corporate culture of the ALUKÖNIGSTAHL GROUP. This particularly applies to the personal data of customers and their employees (the "Data"). The contracting company of the ALUKÖNIGSTAHL GROUP, ("AKS" or "we") respectively acts as the responsible party for processing the data.

Information about the processing of the data can be found below and can be obtained at datasecurity@alukoenigstahl.com, or contact our Data Protection Coordinator at Alukönigstahl GmbH, Goldschlagstraße 87-89, 1150 Vienna.

WHAT DATA IS PROCESSED?

Personal information that you provide to us voluntarily or that we receive from you as part of our business relationship (e.g. in connection with the request for a product or service, contact forms, registrations, personal communications (online or by telephone), or your reference to our service offer) includes the following categories:

- "Master data", such as title, name, contact details (telephone number, e-mail address), date of birth and place of birth, nationality,
- "Authentication data", such as sample signature, login data for web services
- Data from public registers (e.g. business register);
- Data relating to business transactions (e.g. order number, open items);
- Data for documentation purposes, such as consulting protocols;
- Financial data such as creditworthiness;
- Image and sound data, such as video and telephone recordings;
- Information on electronic interaction (e.g. via e-mail, website, intranet), such as IP address, if applicable user name, date and time of access and technical transaction data; when sending e-mails: e-mail, IP address and host name of recipient and sender, number of recipients, subject, date and time of receipt by the server, name of file attachments, size of message, risk classification (spam) and delivery status;
- Marketing and sales data;
- Data related to legal and regulatory compliance requirements.

Automatic data collection

If needed, we also automatically collect certain information about your devices when you visit the website <https://www.alukoenigstahl.at> and other websites operated by us ("our websites"). This data may also include personal information such as IP address, name of accessed files, date and time of access, volume of data transmitted, delivery confirmation, web browser, device type and device identification numbers. We may also collect information about how your device interacts with our website, such as which pages are accessed and which links.

By collecting this information, we can better understand who visits our website, what websites visitors come from, and what content on our website they are interested in. We use this information for internal analysis to improve the quality of our website and to better tailor it to the interests of our visitors. Furthermore, this data can also be used to ensure network and data security.

Some of this information may be collected using cookies or similar technologies. For more information, please see the terms of use for our website.

Data from external sources

We may occasionally receive personal information about you from external sources, such as data from publicly available registers (such as company, association, land register) from published information on websites and from the media) or when we are provided with personal data about you, such as from our affiliates or cooperation partners. In doing so, we verify that these third parties either have your consent or are otherwise legally authorised or obliged to disclose your personal information.

PURPOSES OF DATA PROCESSING

The personal data is processed for the purpose of

- Initiation and execution of the business relationship;
- Billing of services;
- Respond to communications, complaints and service requests you send us;
- Checking the accuracy of the information we hold about you;
- Recording of telephone calls for documentation purposes (e.g. handling of complaints)
- Conducting compliance audits and investigations;
- Fulfilment of legal and regulatory obligations that affect us;
- Organisation of and invitation to events
- Conducting voluntary surveys and sweepstakes;
- Operating, managing, analysing and improving our website;
- Provision of web services and other services (e.g. IT and communication systems)
- IT support and maintenance services;
- Ensuring network and data security.

LEGAL BASIS FOR DATA PROCESSING

The legal basis for the collection and processing of personal data depends on the specific context in which we collect it:

Fulfilment of contractual obligations (Art 6 para 1 lit b DSGVO): Your personal data will be processed to initiate and process contracts with you and the execution of your orders.

Fulfilment of legal obligations (Art. 6 para 1 lit c DSGVO): In some cases, it is also legally required or required for regulatory purposes to process data.

Consent (Art 6 para 1 lit a DSGVO): If we have received your consent, AKS processes your data only to the extent of the given consent (e.g. for direct mailing and newsletter delivery). You may revoke your consent at any time with effect for the future.

Preservation of legitimate interests (Art 6 para 1 lit f DSGVO): Furthermore, we may process your data for the legitimate interests of AKS or a third party. These legitimate interests include, in particular:

- Measures used for business management, further development of service and product offerings, as well as for customer acquisition;
- Advertising and market research, insofar as you have not objected to such use in accordance with Article 21 DSGVO;
- Consultation and exchange of data with credit bureaus (e.g. KSV 1870, AKV) with regard to creditworthiness data and default risks;
- Video surveillance and other measures to prevent or clarify abuse or crime and protect customers and employees as well as the property of AKS.

SPECIFIC DATA CATEGORIES (SENSITIVE DATA)

Specific categories of personal data ("sensitive data") include data stating racial and ethnic origin, political opinions, religious or ideological beliefs, or trade union affiliation, including the processing of genetic data, biometric data to uniquely identify a natural person, health data or data on sex life or sexual orientation of an individual.

We generally do not process such special categories of data.

RECIPIENT OF THE DATA

We may disclose your personal data to the following categories of recipients:

to our employees who need them to fulfil their contractual and legal obligations and legitimate interest; group

companies (as stated herein); external service providers (e.g. IT service providers); and cooperation partners providing data processing services to us or otherwise processing personally identifiable information for the purposes described in this Data Protection Policy (e.g. banks, financial service providers, (credit) insurers, consultants and external legal advisors) or who will be notified when we collect your personal information. A list of our current service providers and partners is available on request. All recipients are obliged to treat your data confidentially and to process it only as part of the provision of services.

to competent authorities, such as tax, regulatory or security authorities, or public bodies, courts or other third parties where disclosure is necessary (i) under applicable laws or regulations, (ii) to exercise, protect or defend our legal rights, or (iii) to protect your important interests or the important interests of another person;

to a prospective buyer (and its agents and advisers) in connection with a proposed purchase, merger or acquisition of our business (or any part thereof), provided we notify the buyer that he may use your personal information only for those purposes specified in this Data Protection Policy;

to any other person, if you agree to the disclosure.

MANDATORY PROVISION OF CERTAIN DATA

Some of the above data may be required for either conclusion of a contract or contract execution or we may be required to collect it by law. If such data is not provided, the contract or the requested services cannot be carried out and, if necessary, an existing contract may need to be terminated.

INTERNATIONAL DATA TRANSFERS

Certain data may also be transmitted to Group companies of the AKS Group for the purpose of initiating and executing a business relationship, billing services, organisation of and invitation to events and direct-mail advertising. This data transfer concerns master data, authentication data, data for business transactions and marketing and sales data.

Individual Group companies of the AKS Group are located in Serbia and Bosnia and thus in countries outside the EU or the EEA, for which an appropriate level of data protection has not yet been determined by the EU Commission. However, AKS has taken reasonable precautions to protect your personal information in accordance with this Data Protection Policy.

DATA RETENTION

We keep your personal data during the current business relationship, as long as this is necessary for the fulfilment of the purpose and beyond that for as long as statutory obligations exist (e.g. storage and documentation obligations under the Federal Tax Code (BAO), Company Code (UGB),

applicable limitation periods (such as general limitation period of 3 years or in certain cases 30 years according to the General Civil Code, ABGB) or if there are other legitimate interests for storage (e.g. as evidence of the assertion of legal rights).

As soon as there are no legitimate purposes for the further storage of the personal data, these are either deleted or anonymised. If this is not possible (e.g. because your personal information has been stored in backup archives), we will securely store your personal information and will not make it accessible to any further processing until deletion is possible.

AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Automated decisions within the meaning of Art. 22 DSGVO mean that a decision that has legal effects on you or that similarly adversely affects you is automatically based on a computer-aided determination (using software algorithms) without any review by a person on our part. We do not use automated decisions.

We process your data only partly automated in order to evaluate certain personal aspects (profiling) and thereby to be able to offer you the best possible services and interest-oriented information.

AFFECTED PERSON RIGHTS

In accordance with the statutory provisions, there is the right to information, correction, deletion, limitation of processing or opposition to processing, to data portability and the lodging of a complaint with a supervisory authority.

To exercise these rights, please contact us at datasecurity@alukoenigstahl.com or Alukönigstahl GmbH, Goldschlagstraße 87-89, 1150 Vienna. We will check into your request and answer accordingly.

UPDATES

This Data Protection Notice may be updated from time to time to reflect legal, technical or business developments. We will take appropriate measures to inform you according to the importance of the changes made. The date of the "last update" can be found at the beginning of this Data Protection Policy.