# The essential information on joint responsibility

# in accordance with Art. 26 (2) of the General Data Protection Regulation (GDPR)

In order to ensure better support for our customers and to optimize our range of services, we manage our customers' contact data as part of a customer relationship management system (CRM), which constitutes joint processing in accordance with Art. 26 GDPR.

The following voestalpine Group companies jointly determine the conditions for the processing of personal data in the CRM system:

## voestalpine Edelstahl Deutschland GmbH

<u>Hansaallee 321</u> 40549 Düsseldorf

Data Protection Officer: Datenschutz-VAED@voestalpine.com

## EschmannStahl GmbH & Co.KG

Otto-Hahn-Straße 3 51580 Reichshof

Data Protection Officer: Datenschutz@eschmannstahl.de

## voestalpine High Performance Metals Deutschland GmbH

<u>Hansaallee 321</u> 40549 Düsseldorf

Data Protection Officer: Datenschutz-VHPMD@voestalpine.com

#### voestalpine eifeler Coating GmbH

Duderstädter Straße 14

40595 Düsseldorf

Data Protection Officer: Datenschutz@eifeler.com

(The aforementioned companies are hereinafter also referred to individually as "**Party**" and collectively as "**Parties**").

With the following information, the parties would like to provide you with the essential content of the agreement that they have concluded in the course of joint responsibility pursuant to Art. 26 GDPR.

#### Data processing processes for joint controllership

The following data processing operations are carried out within the scope of joint controllership: Contact data management, data collection for general customer support, data for setting marketing measures and management of generally accessible business information and business data.

With regard to the data processing processes mentioned above, the parties as joint controllers cite the protection of legitimate interests (Art. 6 para. 1 lit. f GDPR) as the legal basis. Specifically, these are the improvement of customer service through more efficient coordination and communication among the participating voestalpine Group companies and the optimization of the service offering based on this.

# Security of personal data

The parties are jointly responsible for the protection of personal data. All parties process personal data in accordance with the applicable statutory provisions, in particular the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

## Fulfillment of data protection obligations towards the data subjects

As part of the joint responsibility under data protection law, the parties have agreed which of them will fulfill which obligations under the GDPR. This applies in particular to the fulfillment of the following obligations:

### Duty to inform

The parties shall make the information required under Art. 13 and 14 GDPR available to data subjects free of charge in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

# Rights of data subjects

The data subjects can assert their data subject rights in accordance with Art. 15-22 GDPR with each party. The parties shall then inform each other immediately of any legal positions asserted by data subjects. They shall provide each other with all information necessary to respond to requests for information.

# Questions on the agreement on joint processing pursuant to Art. 26 GDPR

If there are any questions regarding the agreement on joint processing, the data subjects can contact the Data Protection Officer of voestalpine Edelstahl Deutschland GmbH (contact: Datenschutz-VAED@voestalpine.com) directly at any time.

# <u>Liability for data protection violations</u>

The contracting parties shall be jointly and severally liable to third parties for liabilities arising from the joint responsibility. An affected person can assert their claims regarding joint responsibility against any party. This party is then liable for the damage, regardless of whether the damage was caused by the specific party or another party.

# <u>Further information on data protection</u>

Further information on data protection and your rights in connection with this processing can be found at any time in the privacy policy for employees on the intranet or the general privacy policy for business partners at <a href="https://www.eifeler.com/de/datenschutz/">www.eifeler.com/de/datenschutz/</a>.