

Data privacy policy as per the EU General Data Protection Regulation for natural and legal persons

The following information will provide you with an overview of the processing of your personal and business-related data by us and your rights under the data protection law. The products or services agreed upon are what mainly determine which data is processed in detail and how it is used. The following data privacy policy applies particularly to clients, suppliers, potential buyers and authorised representatives/agents.

1. Who is responsible for the data processing and whom can I contact concerning this?

I. The body in charge is

Richard Anton KG

Wuermstrasse 55, 82166 Graefelfing

Telephone: 089 - 8981440 or e-mail: info@richard-anton.de

represented by managing partner Mr. Florian Mader

You can reach our data protection officer, Mr. Stephan Krischke, at datenschutz@richard-anton.de

2. Which sources and data do we use?

We process personal data that we receive within the scope of our business relationships with our clients. We also process personal data (provided that this is needed for fulfilling the business relationship or performing our services) that we obtain legally from sources accessible by the public (trade and association registers, the press, the Internet) and is transmitted to us legally by other companies or third parties. Relevant personal data in the buying process, the collection of master data, commissioning, etc. can include personal information (e.g. first and last names, address, e-mail and telephone number), delivery and payment data (e.g. account details) and order data (e.g. order information). In addition, this data can also be data required for fulfilling contractual obligations and data for other data similar to the categories mentioned.

3. Why do we process your data (purpose of processing) and on what legal basis?

We process personal/company-related data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and Federal Data Protection Act (BDSG).

- a) For fulfilling contractual obligations (Art. 6 (1) lit. b of the GDPR): The data is processed for handling commercial transactions within the scope of performing our contracts with our clients and taking steps prior to entering into a contract upon request (e.g. by potential buyers). The purposes of data processing mainly depend on the specific product (e.g. recarburizer, petcoke, graphite and pig iron) and can include market analysis, consulting, quality management and the fulfilment of contractual obligations. You can find more details on the purposes of data processing in the main contract documents and terms and conditions.
- b) Within the scope of weighing interests (Art. 6 (1) lit. f of the GDPR): If required, we process your data beyond the actual fulfilment of the contract to protect our legitimate interests, e.g. trade fair invitations, safety instructions for products and for improving customer loyalty by providing information on product improvements or innovations.

- c) Based on your consent (Art. 6 (1) lit. a of the GDPR): If you have given us your consent to process your personal data for specific purposes, this instance of processing is lawful based on your consent. Consent provided can be withdrawn at any time. This also applies to withdrawing declarations of consent that have been given to us before the GDPR came into effect, i.e. before 25.05.2018. Withdrawing consent shall not affect the lawfulness of the data processed up until the revocation.
- d) Based on legal provisions (Art. 6 (1) lit. c of the GDPR) or in public interest (Art. 6 (1) lit. e of the GDPR): We, as a company, are also subject to several legal obligations, i.e. statutory requirements as well as commercial and tax law legislations. The purposes of processing include identity testing, fraud and money laundering prevention and the fulfilment of tax obligations.

4. Who will have access to my data?

In our company, the bodies and employees that need your data for fulfilling our contractual and legal obligations will have access to your data. Service providers and subcontractors hired by us can also obtain access to your data for these purposes if they maintain secrecy. As concerns forwarding data to recipients outside our company, it must be noted that we, as a company, are obligated to maintain confidentiality of all client-related facts and evaluations of which we have knowledge. We are only allowed to forward your data when stipulated under statutory requirements, you have consented to this or we are required by law to provide information.

5. Will the data be transferred to a third country or international organisation?

The data will be transferred to bodies in countries outside the European Economic Area (so-call third countries) if

- it is necessary for executing the contract
- it is prescribed by law, or
- you have given us your consent.

We will not transfer any personal data beyond this to bodies in third countries or international organisations.

6. How long will my data be saved for?

We will process and store your personal data for as long as it is required for fulfilling our contractual and legal obligations. Please note that our business relationship is a continuing obligation, which can also extend over a longer period. If the data is no longer required for fulfilling contractual or legal obligations, this will be regularly deleted unless it is necessary to temporarily process it further for the following purposes:

- Fulfilling commercial and tax law-related obligations to retain data: the commercial code (HGB), the tax code (AO), and the Money Laundering Act (GwG). The period specified by these for storage or documentation is two to ten years.
- Receiving evidence within the scope of the statutory limitation periods. As per §§ 195 et seqq. of the German Civil Code (BGB) these limitation periods can go up to 30 years, where the regular limitation period is 3 years.

7. What are my data protection rights?

Every data subject has the right of access as per Art. 15 of the GDPR, the right to rectification as per Art. 16 of the GDPR, the right to erasure as per Art. 17 of the GDPR, the right to restriction of processing as per Art. 18 of the GDPR, the right to object as per Art. 21 of the GDPR and the right to data portability as per Art. 20 of the GDPR.

Regarding the right of access and right to erasure, the restrictions under §§ 34 and 35 of the BDSG shall apply. In addition, the data subject has the right to lodge a complaint with the relevant data supervisory authority (Art. 77 of the GDPR in conjunction with § 19 of the BDSG). You may, at any time, withdraw consent given to us regarding the processing of your personal data. This also applies to withdrawing declarations of consent that have been given to us before the General Data Protection Regulation came into effect, i.e. before 25.05.2018. Please note that this withdrawal will only be effective for the future. The withdrawal of consent shall not affect the processing based on consent before its withdrawal.

8. Is it compulsory for me to provide data?

Within the scope of our business relationship, you need to provide us with the personal data that is required for establishing and conducting a business relationship and fulfilling the related contractual duties or data that we are required by law to collect. Normally, we cannot enter into the contract with you or execute it without this data.

9. To what extent is automated decision making carried out?

In general, we do not make use of automated decision making according to Art. 22 of the GDPR for establishing and conducting a business relationship.

10. Does profiling take place?

We do not process data with the aim of evaluating specific personal aspects.