

This notice provides you with information on how Schoeller Bleckmann Edelstahlrohr GmbH, Rohrstraße 1, A-2630 Ternitz („SBER“, “we”) processes personal data. Which data in particular and how it is processed, depends significantly on the agreed services. Therefore, not all parts of this notice will apply to you.

1. Which categories of data we process

Relevant personal data are:

- » business contact information, such as name, work address, work telephone number and email address;
- » payment data, such as the necessary information for processing payments and fraud prevention, including credit card numbers and card security codes;
- » information collected from publicly available sources, information databases and credit agencies;
- » other information that has to be processed to initiate, process and manage (contractual) business relationships or that you voluntarily provide, such as orders, order details, requests, project details, correspondence and other data regarding to the collaboration.

2. Which sources we use

We process data which we receive through your personal information or in the course of our business relationship (e.g. offers, order confirmations) In addition, we process – as far as necessary - Information collected from publicly available sources (e.g. land register, company register, press, internet), information databases and credit agencies or information which was legitimately transmitted from other third parties.

If aforementioned personal data is not provided or is insufficient or if SBER cannot collect the respective personal data the purposes described may not be met or the received inquiry/inquiries could not be processed. Note that this would not be considered failure to fulfil our obligations under a contract.

3. Purposes for which we process your data and legal basis of the processing

a. Processing is necessary for the performance of a contract to which the data subject is party (Article 6 subsec.1 lit.b GDPR)

The processing fulfils purposes of rendering of our service in the course of our contracts with customers and suppliers and for the execution of pre-contract measures. The purposes of the data processing primarily depend on the concrete product or the concrete service. Foremost the data processing is used for

- » the identification of customers/suppliers;
- » appropriate consulting services;
- » correspondence with you;
- » correct invoicing and invoice processing.

b. Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (Article 6 subsec.1 lit.f GDPR)

As far as necessary, we process data to safeguard legitimate interests of SBER or third parties: Examples are:

- » in order to ensure IT-security and IT-operations;
- » measures for business management and development of services and products and risk management in our company;
- » settling disputes, enforcing our contractual agreements and establishing, exercising or defending legal claims.
- » Transmission to affiliated companies esp. for inspection and consultation in order to ensure better conditions.

c. Processing is necessary for compliance with a legal obligation to which we are subject (Article 6 subsec.1 lit.c GDPR).

Furthermore, we have to observe legal obligations that make it necessary to process personal data. These obligations are amongst other things fiscal reporting obligations, the assessment and controlling of risks in our company and the observance of statutory retention obligations.

4. Transfer of your personal data

If legally permitted to do so and for the purposes set out in Point 3, SBER may transfer personal data to

- » IT service providers within the scope of an IT support contract
- » other companies that are part of our corporate group (sales)
- » courts, authorities, attorneys
- » banks, insurance companies, credit agencies
- » other business partners (e.g. shipping and logistic partners for executing and processing orders).

Some of the recipients referred to above are located in or process personal data outside of your country. The level of data protection in another country may not be equivalent to that in your country. However, we only transfer your personal data to countries where the EU Commission has decided that they have an adequate level of data protection, or we take measures to ensure that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EC and/or 2004/915/EC).

5. Retention periods

We process and store your personal data at least as long as our business relationship is upright. Please note that, as a rule, our business relationship is a continuing obligation that lasts for many years. After termination of the business relationship, your data will be stored as long as it is necessary for the fulfilment of the purposes of the processing (set out in Point 3), as long as there are statutory retention obligations (esp. for commercial and tax law reasons) and potential legal claims are not yet time-barred.

6. Controller and contact details

Please address your requests or questions concerning the processing of personal data to:

Schoeller Bleckmann Edelstahlrohr GmbH
represented by the managing director
Rohrstraße 1
2630 Ternitz, Austria

e-mail: dsgvo@sber.co.at
phone: +43-2630/316-0

General rights in connection with your personal data

Under applicable law, you have, among others, the rights (under the conditions set out in applicable law):

- (i) to check whether and what kind of personal data we hold about you and to request copies of such data,
- (ii) to request correction, supplementation or deletion of your personal data that is inaccurate or processed in non-compliance with applicable requirements, and
- (iii) to request the restriction of processing of your personal data,
- (iv) in certain circumstances, to object for legitimate reasons to the processing of your personal data or to revoke consent previously granted for the processing,
- (v) to request data portability,
- (vi) to know the identities of third parties to which your personal data are transferred, and
- (vii) to lodge a complaint with the competent authority.