



## INFORMATION FOR BUSINESS PARTNERS FOR THE PROCESSING OF PERSONAL DATA

Dear business partner,

Umicore Galvanotechnik GmbH is committed to protecting the privacy of its business partners when processing personal data. From May 2018, new standards for data protection within the European Union will be set by the General Data Protection Regulation ("GDPR").

"Business partner" means any natural person with whom Umicore Galvanotechnik GmbH has a business relationship, in particular representatives and employees of customers, suppliers, service providers and competitors. The purpose of this letter is to inform business partners in Europe about the processing of their personal data by Umicore Galvanotechnik GmbH.

### **I. Responsibilities and contact details**

The responsible party for your personal data is:

Umicore Galvanotechnik GmbH  
Klarenbergstrasse 53 - 79  
73525 Schwaebisch Gmuend  
Germany  
Email: [galvano@eu.umicore.com](mailto:galvano@eu.umicore.com)

The contact details of our data protection officer are as follows:

Andreas Zimmermann  
Liststraße 4  
73035 Goeppingen  
Germany  
Email: [a.zimmermann@consilium-zimmermann.eu](mailto:a.zimmermann@consilium-zimmermann.eu)

## II. Use of your personal data

Your personal data is processed, as far as necessary, for the protection of our legitimate interests (Art. 6 para. 1 f GDPR), including, - for the conclusion or implementation of contracts and other business relationships (including the processing of purchase orders, deliveries or payments, or in connection with complaints and repair/maintenance work or in warranty cases) or to prepare or respond to requests for quotations, to determine the terms of the contractual agreement and with regard to product development activities, in each case with our customers, suppliers, service providers and competitors for whom you may be acting as agent or employee;

- to transfer your personal data within the company for internal administrative purposes (e.g. for accounting purposes);
- to ensure IT security;
- to prevent criminal offences;
- to conduct compliance investigations;
- to ensure building and facility security (this includes video monitoring as far as necessary to protect our premises).

In addition, personal data is processed for the purpose of fulfilling contracts with individuals (natural persons) with whom we maintain business relations, e.g. to process purchase orders, deliveries or payments, or in connection with complaints, repair/maintenance work or in warranty cases, or to prepare and respond to requests for quotations from individuals, to determine the terms of the contractual agreement and with regard to product development activities (Art. 6 para. 1 b GDPR).

The person responsible is subject to various legal obligations (Art. 6 para. 1 c GDPR), which may require the processing of your personal data. These legal obligations may result, for example, from tax, foreign trade or sanctions regulations.

## III. Recipient of your personal data

Within the company, only authorized employees of Umicore Galvanotechnik GmbH with appropriate responsibilities have access to your personal data.

We are authorized to engage third parties such as IT service providers, legal advisors or management consultants to provide services on our behalf and under our supervision and according to our instructions. These third parties may have access to your personal information to the extent necessary to provide their services.

#### **IV. Data transfer**

For the purposes mentioned under point II., your personal data may be disclosed not only to Umicore Galvanotechnik GmbH, the contractual partner (and the party responsible for processing your personal data), but also to the companies and their service providers within and outside the European Economic Area (EEA).

Countries outside the EEA may have different data protection rules than your country of residence. In the case of transfers of your personal data to other countries as described above, we will take reasonable steps to ensure that your personal data is adequately protected in those countries. In particular, we will enter into appropriate agreements with these recipients of the data which will include the EU standard contractual clauses.

#### **V. Your rights**

You have the right to receive information about your personal data and to request the correction or deletion of your personal data or the restriction of processing, to the extent permitted by applicable law.

You have the right to object to any processing of your personal data, as described in point II, and to receive your personal data in a structured, common and machine-readable format (data transferability), in accordance with applicable law and subject to legal review in each individual case by the controller of your personal data. In addition, you have the right to lodge a complaint with a supervisory authority.

#### **VI. Data confidentiality and storage**

Each of our employees and all employees of external service providers who have access to and/or process personal data are obliged to treat this data as confidential.

## VII. Contact

If there are any questions, comments or suggestions regarding this information letter or our handling of data protection, please contact the e-mail address or the data protection officer.