

Castolin Sp. z o.o.  
2 lipca 2024 roku

## Information about personal data processing for business partners of the Castolin Eutectic Group

With the following information, we would like to inform you as a business partner, interested party or contact person of a business partner or interested party about our approach to collection, use and disclosure of personal data.

### 1. Who is responsible for processing your data?

Responsible for data collection and processing is

Castolin Sp. z o.o.

Leonardo da Vinci 5, 44-109 Gliwice, Poland

### 2. What categories of your data do we process at Castolin Sp. z o.o. in the course of conducting business relations?

The types of personal data processed about our business partners, including both suppliers and customers in the strict sense, include in particular the ordinary data (name, function, company name) and the contact data (business address, telephone numbers, fax number and e-mail address) of the contact person responsible for us, etc.

In addition, we process contracts concluded as part of contractual relationships (communication history, contractual agreements, prices, negotiated goods, services, order history and related offers and orders).

Your personal or data of your employees are usually collected directly from you during the bidding or contracting phase or during an ongoing business relationship, or from your employer, who is in contact with Castolin Sp. z o.o. in the business relationship for the purpose of fulfilling it.

Data on the history of the business relationship (communications, contract details, contact persons, etc.) is collected as part of the shared business relationship and stored in our customer management system (CRM) during the process.

In certain collections, personal data are also collected from other entities due to legislation or legitimate interest. This applies in particular to enquiries related to events concerning economic credibility by credit agencies. However, in the vast majority of cases, this information concerns exclusively the company with which the Castolin Sp. z o.o. maintains a contractual relationship and not individuals, unless they are our direct business partner and are acting and trading in their own name (e.g. as a registered trader or as an individual for their own account).

### 3. For what purposes and on what legal basis do we process your personal data?

Castolin Sp. z o.o. processes your data only if a contract with you or the law permits or even obliges us to do so or if you have voluntarily given your express consent to the processing of your data.

#### **Data processing for contract performance:**

If as an individual, you are our customer ( recipient) or contractor (e.g. subcontractor, service provider or supplier), we will collect and process your above-mentioned data exclusively for the purpose of entering into a contract (e.g. in the context of preparing offers) and performing the contract (e.g. for the provision of services or invoicing of services). In this case, the legal basis is Article 6(1) (b) GDPR.

#### **Data processing from due to legal obligations:**

There may be a number of different legal obligations that require the processing of your personal data . These legal obligations may arise, for example, from tax law, commercial law and foreign trade law or sanctions regulations. The legal basis in such a case is Article 6(1) (c) GDPR.

#### **Processing of data on the basis of legitimate interest:**

If you are an employee of one of our customers or contractors (service provider, subcontractor or supplier), we collect and process your business data, as defined above, for the sole purpose of initiating and performing a contract with your employer . We process your data on the basis of our legitimate interest to contact you and perform the contract with you as a representative of your employer . The legal basis in this case is a rt. 6 (1)(f) GDPR.

In addition, we may use your contact details as current business partner or employee of a business partner for promotional purposes by post, email or telephone.

To the extent that you exercise your rights against us under the GDPR, we also process your personal data in order to demonstrate, as part of our accountability under Article 5(2) of the GDPR, that we have complied with the provisions of the GDPR when processing your requests.

In addition, in connection with your enquiry, we may provide your personal data to our external data protection officer, who advises on all data protection issues and, in particular, supports us in processing enquiries from data subjects in connection with the assertion of rights under the DPA.

The legal basis in this case is Article 6(1) (f) GDPR.

#### **Data processing based on consent :**

In addition, the processing of your personal data may be based on your voluntary consent within the meaning of Article 6(1) sentence 1 lit. a of the GDPR.

For example, email newsletters with information about our services and our company will only be sent to you if you have given your express prior consent.

Under no circumstances will we pass on your data to unauthorised third parties. M you can revoke your consent at any time with effect for the future in accordance with Article 7 paragraph 3 of the DPA.

To do so, please contact the email address given above in the "Responsible person" section.

#### 4. Are you obliged to provide your data?

In the context of the performance of a contract with you pursuant to Article 6(1)(b) of the GDPR directly as a contractual partner or the processing of data pursuant to Article 6(1) sentence 1(f) of the GDPR in connection with you acting as a contact person for one of our customers or service providers and suppliers, we only process your mandatory business data in order to be able to process basic orders and customer relations.

Without this data, it is not possible to establish contact and even a contractual relationship. Excluded from this are, of course, those data processing operations that are based solely on promotional activities or on your consent . The latter are always voluntary. M you can revoke your consent at any time with effect for the future. If you do not wish to be contacted by post or telephone, you can of course object.

#### 5. Who receives your data ?

As part of Castolin Sp. z o.o. Your personal data are only received by those persons and authorities who need them to fulfil our contractual and legal obligations or to protect our legitimate interests. This includes, for example, companies of the G rup Castolin Eutectic.

In addition to our group of companies, your personal data are only received by those persons and entities that we engage to fulfil our contractual and legal obligations or to protect our legitimate interests (e.g. authorities, subcontractors). To the necessary extent, the relevant contracts for contractual data processing are, of course, concluded in accordance with Article 28 GDPR.

We use subcontractors for logistics purposes and provide them with personal data<sup>1</sup> from your contact person to keep you informed about the transport of goods to and from our Warehouse<sup>2</sup> .

#### 6. Will your data be transferred to a third country?

If we transfer personal data to recipients outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the European Commission as having an adequate level of data protection, an adequate level of data protection has been agreed with the recipient (e.g. by means of EU standard contractual clauses) or you have given your consent.

#### 7. How long will your data be stored?

Your ane personal data will be stored for as long as this is necessary for the performance of the contract and for the fulfilment of legal obligations by the responsible party, insofar as

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<sup>1</sup> Personal data provided to our Subcontractors may include name, address (company), telephone number, e-mail address.

<sup>2</sup> These include, for example, the dimensions and weight of shipments, references, warehouse opening hours, driver notifications, anticipated delays, planned loading/unloading times, documents relating to a particular load.

this does not prevent the deletion of the data (e.g. legal obligations to provide evidence and storage obligations under the German Commercial Code and the German Tax Code). In individual cases, your personal data may be stored for longer (e.g. in the event of legal/administrative proceedings ). If the business relationship with you no longer exists or is no longer expected, your data will be deleted within the permitted period.

#### 8. What data protection rights can you claim as a data subject?

Pursuant to Article 15(1) of the GDPR, you have the right to request free information about your data stored by the Castolin Sp. z o.o. Furthermore, you have the right to rectification (Article 16 GDPR), erasure (Article 17 GDPR) and restriction of processing (Article 18 GDPR) of your personal data if the legal requirements are met. If the processing is based on Article 6(1) sentence 1(e) or (f) GDPR, you have the right to object in accordance with Art. 21 GDPR.

If you object to the processing, it will not be carried out in the future unless the controller demonstrates compelling legitimate grounds for further processing that outweigh the interests of the objecting data subject. If you have provided the processed data yourself, you have the right to data portability in accordance with Article 20 GDPR. To the extent that the processing is based on consent pursuant to Article 6(1)(1)(a) GDPR, you may withdraw your consent at any time with effect for the future without affecting the lawfulness of the earlier processing. In the above-mentioned cases, in case of open questions or in case of complaints, please contact the above-mentioned "responsible person" in writing or by e-mail.

You may also have the right to lodge a complaint with the data protection supervisory authority (Art. 77 GDPR). The data protection supervisory authority competent for the Member State in which you live or in which you are established is responsible for dealing with your complaint about data.

#### 9. Contact details of the Group Data Protection Officer

Our Data Protection Officer is happy to provide information or suggestions on data protection. Please contact us for this purpose:

Data Protection Officer Group Castolin Eutectic  
E-mail: [dataprotection@castolin.com](mailto:dataprotection@castolin.com)

#### 10. Amendment of these and information for business partners

This privacy policy was last updated on 12.07.2024.