

## A GENERAL

The Rheinmetall Group companies<sup>1</sup> are obliged to comply with the German Data Protection Act (Bundesdatenschutzgesetz) and, in conjunction with this, with the principles of the EU General Data Protection Regulation (EU-GDPR). In particular in the business partner verification process the strict implementation of the EU-GDPR is of decisive importance due to the processing of a large amount of personal data.

In order to meet the requirements of Articles 13 and 14 of the EU-GDPR, the data protection information contained in Section B is included as an integral part of the business partner verification process.

This inclusion is systemically guaranteed by the audit management tool for which CAM is responsible. For business partner checks that are based on paper verification documentation, the following letter on data protection information must be handed over to the business partner by the R/A.

## B DATA PROTECTION INFORMATION

### 1. Information for the business partner about the Rheinmetall Group business partner check

The performance of a business partner check in strict Compliance with the German Data Protection Act (Bundesdatenschutzgesetz) and the General Data Protection Regulation is an integral part of the Rheinmetall Group's Compliance management system and contributes to compliance with statutory and regulatory requirements.

Obtaining certain information such as master data, ownership structures and management bodies, as well as integrity and absence of conflict, is an integral part of every business partner check and essential for its success. Only in this way can Rheinmetall obtain and evaluate certain key information on a business partner in order to assess various quality and safety criteria.

If you become a business partner of a company consolidated under the Rheinmetall Group umbrella, you will be subject to this business partner review both initially and on a recurring basis during the course of the business relationship. A list of all companies can be found on the Rheinmetall AG website at [https://www.rheinmetall.com/de/rheinmetall\\_ag/group/locations\\_worldwide/locations-worldwide.php](https://www.rheinmetall.com/de/rheinmetall_ag/group/locations_worldwide/locations-worldwide.php).

In the following we, the Rheinmetall Group / Rheinmetall Aktiengesellschaft, Rheinmetall Platz 1, 40476 Düsseldorf, Germany, hereby inform you pursuant to Art. 13 and 14 GDPR about the processing of personal data of our business partners (e.g. suppliers / service providers, cooperation partners or sales partners).

### 2. Controller and Data Protection Officer

The contact details of the company data protection officer are as follows:

Controller for data processing	Contact details of the data protection officer
<p>The controller for data processing for the corresponding business partner verification process is the Rheinmetall company that has initiated the assessment on your company / you. The name of said company was provided to you via the system-generated email sent from our business partner approval management tool <b>Vantage</b>.</p>	<p>Please refer to the corresponding data protection officer responsible for the Controller for data processing / Rheinmetall company that has initiated the business partner verification process on your company / you under:</p> <p><a href="https://www.rheinmetall.com/en/rheinmetall_ag/group/compliance/datenschutz_1/informationsschreiben/index.php">https://www.rheinmetall.com/en/rheinmetall_ag/group/compliance/datenschutz_1/informationsschreiben/index.php</a>.</p>

<sup>1</sup> All companies in which Rheinmetall AG holds the majority of shares/the majority of voting rights directly or indirectly, and companies over which Rheinmetall AG can exercise a controlling influence directly or indirectly.

### 3. Information on data categories

As part of our business partner check, we process the following categories of personal data in particular:

- Personal and contact information (e.g. surname, first name, address, position)
- Bank details information
- Company and industry information (e.g. industry, financial ratios, management, credit ratings)
- Entries on sanctions and terrorism lists
- Reporting about companies and persons

### 4. Purpose and legal bases of processing personal data

#### 4.1 Data processing for the purpose of contract initiation and execution (Art. 6, Par. 1, Clause 1, Letter B, GDPR)

Data is processed insofar as it is necessary for the initiation and execution of contracts for goods and services. The purposes pursued in detail with the data processing result from the contractually stipulated purposes for the implementation of our business relations.

#### 4.2 Data processing from legitimate interest (Art. 6, Par. 1, Clause 1, Letter f, GDPR)

We process your data in a permissible manner to protect the legitimate interests of us and third parties. This includes in particular the use of your personal data for the following applications:

- Consultation of and data exchange with credit agencies to identify addresses, activities, company structure, holders of management positions, ownership, creditworthiness and default risks.

The legitimate interests of third parties exist in particular with regard to data processing by Group companies within the framework of reporting and internal Group risk management.

#### 4.3 Data processing based on legal requirements (Art. 6 Par. 1c) GDPR) or in the public interest (Art. 6, Par. 1, Clause 1, Letter e, GDPR)

As a company, we are subject to various legal obligations (e.g. tax codes / Tax Code, Commercial Code), which make it necessary to process your data to comply with the law. This concerns, for example, the annual financial statements.

### 5. Categories of recipients of personal data / Transfer to an EU/EEA third country

We pass on your personal data within our company exclusively to those areas which need this data to fulfil their contractual and legal obligations or to implement our legitimate interest. This also applies to service providers and vicarious agents employed by us. Personal data will only be transmitted by us to third parties and other recipients if this is necessary for the aforementioned purposes or if this is legally obligatory.

The recipients of data include:

- IT service providers
- Credit agencies and other service providers for the identification of addresses, activities, corporate structure, holders of management positions, ownership relationships and creditworthiness or default risks
- In the event of a statutory or official obligation: Public bodies and institutions (e.g. public prosecutor's office, police, supervisory authorities, tax office)

In addition, we are subject to regulatory reporting and publication obligations, for the implementation of which we pass on data to authorised third parties (e.g. auditors, supervisory authorities).

The following licensed credit agencies are currently in use with us: Bisnode Deutschland GmbH, Euler Hermes, Creditreform, LexisNexis GmbH, Bureau van Dijk, Thomson Reuters und Companyhouse.

You can obtain detailed information within the meaning of Art. 14 GDPR from the aforementioned companies, i.e. information on the business purpose, the purposes of data storage, the data recipients, the right to self-disclosure, the right to deletion and rectification, etc.

For Bisnode Deutschland GmbH and Bisnode Marketing GmbH, you can find these under: <https://www.bisnode.de/datenschutz/>

For Euler Hermes, they can be found under: <https://www.eulerhermes.de/datenschutz.html>

For Verband der Vereine Creditreform e.V., you can find these under: <https://www.companyhouse.de/Datenschutz>

For LexisNexis GmbH, you can find this information under: <https://www.lexisnexis.com/global/privacy/de/privacy-policy-bis.page>

For Bureau van Dijk, you can find these under: <https://www.bvdinfo.com/de-de/privacy-and-cookies>

For Thomson Reuters, you can find this under: <https://www.thomsonreuters.com/en/privacy-statement.html>

For Companyhouse AG, you can find these under: <https://www.companyhouse.de/Datenschutz>

A transfer of personal data to a country outside the EU or the EEA will only take place if either an adequacy decision of the EU Commission exists for the respective country or if there are other appropriate data protection safeguards within the meaning of Art. 44 et seq. of the EU Data Protection Act exist. GDPR (e.g. EU standard contractual clauses). Such a transmission is also permissible if an exception is fulfilled, in particular if you have consented to the transmission to such a country in accordance with the legal requirements (see in particular Art. 49 GDPR).

## 6. Duration of storage or deletion of personal data

We process your personal data for the above-mentioned purposes. Your data will be processed for the first time from the time of collection if you or a third party informs us of this. We will delete your personal data when the contractual relationship with you has ended, all mutual claims have been met and there are no other statutory storage obligations or legal justifications for the storage. These include, among other things, storage obligations from the German Commercial Code (HGB) and the German Tax Code (AO). This means that we will delete your personal data at the latest 10 years after the end of the contract after the expiry of the legal storage obligations. In individual cases, the deadline may be extended (e.g. in the case of ongoing tax audits or in the context of the preservation of evidence).

## 7. Your rights

If you have any questions or complaints regarding data protection, please feel free to contact us or our data protection officer (see above). You have the right to information pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to deletion pursuant to Art. 17 GDPR, the right to restriction of processing pursuant to Art. 18 GDPR, the right to objection pursuant to Art. 21 GDPR and the right to data portability pursuant to Art. 20 GDPR. In addition, you have the option of contacting the competent supervisory authority.

## 8. Right of objection

If the processing of data is based on Art. 6 Par. 1f) GDPR, you have the right to object to this processing at any time for reasons arising from your particular situation. Please contact the contact person known to you directly.

**9. Necessity of providing personal data**

As part of our business relationship, you must provide the personal information necessary to establish and conduct the business relationship and to fulfil the contractual obligations associated therewith, or which we are legally required to collect. Without this data we cannot conclude and execute the contract with you.

**10. Automated decision making**

There shall be no automated decision-making, including profiling, for the purpose of establishing and implementing this agreement.

**11. Data sources**

We process personal data that we have received from our business partners and their contact persons in the course of our business relationship. We also process personal data that we are permitted to collect from publicly accessible sources, e.g. databases, commercial registers, the press and the Internet, as well as data from credit agencies. We also process personal data that we are permitted to collect from companies within our Group or from other third parties.

**12. Change clause**

As our data processing is subject to change, we will also change our privacy policy from time to time.