

## 1. General information on the Rheinmetall Group's business partner assessments

Close and trusting cooperation with a wide variety of business partners operating worldwide (e.g. suppliers, service providers, cooperation partners, sales partners, customers) are essential to the success of the Rheinmetall Group. In order to avoid compliance risks and meet regulatory requirements, the careful selection, review and ongoing monitoring of business partners is an integral part of the compliance management system at Rheinmetall.

In order to carry out proper business partner assessments ("third party assessments"), it is necessary to obtain certain information such as master data, ownership structures and management bodies as well as information on the integrity and freedom from conflict of relevant persons. Only in this way can Rheinmetall obtain and evaluate certain key information about a business partner in order to be able to assess relevant criteria, in particular regarding integrity, compliance, quality, reliability and security.

Business partners of Rheinmetall Group companies are generally subjected to such a business partner assessment before entering into a business relationship and subsequently at recurring intervals.

In accordance with Art. 13 and 14 of the EU General Data Protection Regulation (GDPR), we hereby inform you about the processing of personal data (in short "data") in connection with the business partner assessments.

## 2. Controller and Data Protection Officer

| Controller<br>(Company responsible for the data processing)  | Contact details of the<br>Data Protection Officer   |
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| <p><b>The Rheinmetall company that initiated the assessment of your company/companies is responsible for the data processing</b> in connection with the business partner assessment. Typically, this is the company with which you intend to establish or continue a business relationship.</p> <p>This <b>responsible company is usually communicated to you by e-mail</b> (either automatically from the relevant system for the business partner check or individually).</p> <p><b>The parent company of the Rheinmetall Group is the primary contact for inquiries regarding the business partner assessment:</b><br/> <b>Rheinmetall AG</b><br/>           Corp. Compliance - CDD<br/>           Rheinmetall Platz 1<br/>           40476 Düsseldorf, Germany<br/> <a href="mailto:tpa@rheinmetall.com">tpa@rheinmetall.com</a></p> <p>A <b>list of the Rheinmetall Group companies, including contact details</b>, can be found on the Rheinmetall AG website at<br/> <a href="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</a>.</p> | <p>Please contact the <b>responsible Data Protection Officer of the Rheinmetall company</b> responsible for data processing (see left column).</p> <p>The <b>Group Data Protection Officer</b> is responsible for <b>Rheinmetall AG</b> and the <b>vast majority of the German Rheinmetall companies (only those companies, which have to appoint a Data Protection Officer)</b>. You may reach him/her via the following contact details:</p> <p><b>Rheinmetall AG</b><br/>           Group Data Protection Officer<br/>           Rheinmetall Platz 1<br/>           40476 Düsseldorf, Germany<br/> <a href="mailto:DSB-RhAG@rheinmetall.com">DSB-RhAG@rheinmetall.com</a></p> <p>The <b>contact details of the Data Protection Officers of other Rheinmetall companies</b> can be found here:<br/> <a href="https://www.rheinmetall.com/de/rheinmetall-ag/service/imprint/datenschutzbeauftragte/index.php">https://www.rheinmetall.com/de/rheinmetall-ag/service/imprint/datenschutzbeauftragte/index.php</a><br/> <i>(Only those companies are listed here that are required by law to appoint a Data Protection Officer or have appointed one voluntarily).</i></p> |

### 3. Data categories

In the course of the business partner assessment, the following categories of personal data of the business partner and/or relevant persons associated with the business partner (usually managing directors or board members, beneficial owners and, if applicable, other relevant key and contact persons) are processed in particular:

- Personal and contact information (e.g. surname, first name, address, position)
- Bank account information
- Company and industry information (e.g., industry, financials, management, credit ratings)
- Entries in official sanctions and terrorism lists
- Reporting on companies and persons
- Information on economic activities and relationships
- In certain cases (especially in the case of sales agents or individual entrepreneurs), it may be necessary to request copies of identification documents (e.g., ID card, passport).

### 4. Purposes and legal bases of the data processing

Data processing in connection with the business partner assessments is carried out to safeguard the legitimate interests of the Rheinmetall Group (Art. 6 para. 1 lit. f GDPR) and to comply with statutory regulations (Art. 6 para. 1 lit. c GDPR).

#### 4.1 Data processing for legitimate interests (Art. 6 para. 1 lit. f GDPR)

The overriding legitimate interests of the Rheinmetall Group or the responsible Rheinmetall company in the data processing in connection with the business partner assessments are:

- Avoidance and reduction of compliance risks regarding the selection of business partners
- Ensuring the integrity and conflict-free nature of business partners
- Consideration of regulatory requirements when selecting business partners
- Intra-Group risk management
- Defense, exercise or assertion of legal claims

These legitimate interests include, in particular:

- Involvement of and data exchange with credit agencies and other service providers to determine relevant information about the business partner and relevant persons associated with him (e.g. addresses, activities, corporate structure, holders of management positions, ownership, creditworthiness, default risks, economic relationships, conflicts of interest).
- Use of external databases and research tools to identify relevant information (see exemplary list in previous point) for the required testing activities.

More information on the possible recipients of your data may be found in section 5.

#### 4.2 Data processing to comply with statutory regulations (Art. 6 para. 1 lit. c DSGVO)

In addition, data processing in connection with the selection or assessment of business partners is also necessary to comply with statutory requirements, in particular:

- **Check with official sanction and anti-terror lists** (e.g. according to EU Regulations No. 2580/2001 and 881/2002)
- **Documentation and retention obligations** (e.g. due to commercial, tax or company law obligations)

## 5. Categories of recipients of personal data / data transfers outside the EU

We only share your personal data within the Rheinmetall Group with those departments that are involved in carrying out the business partner assessments or in the selection of business partners.

Your data will only be transferred to recipients outside the Rheinmetall Group (e.g. credit agencies, service providers, authorities) if this is necessary to fulfill the aforementioned purposes or if we are legally obliged to do so.

**Categories of recipients of the data include:**

- IT service provider
- Credit agencies and other service providers to identify relevant information for business partner assessments (e.g., addresses, activities, corporate structure, holders of management positions, ownership, and credit or default risks)
- In the event of a legal or administrative obligation: Public bodies and institutions (e.g. public prosecutor's office, police, supervisory authorities, tax office).

In particular, the following **credit agencies and service providers** may be used:

- **Verband der Vereine Creditreform e.V.** (Hammfelddamm 13, 41460 Neuss, Germany; <https://www.creditreform.de/datenschutz>).
- **Dun & Bradstreet Deutschland GmbH** (Robert-Bosch-Strasse 11, 64293 Darmstadt, Germany; <https://www.dnb.com/en-gb/privacy>)
- **Euler Hermes SA / Allianz Trade** (German branch: Gasstraße 29 22761 Hamburg, Germany; <https://www.allianz-trade.de/privacy-notice.html>)
- **Bureau van Dijk Editions Electroniques Sàrl** (a Moody's Corporation company, Avenue Louise 250, 1050 Brussels, Belgium; <https://www.bvdinfo.com/en-gb/product-privacy-policy>)
- **LexisNexis GmbH** (Heerdter Sandberg 30, 40549 Düsseldorf, Germany; <https://www.lexisnexis.com/en-us/privacy/data-privacy-principles.page>)
- **CompanyHouse AG** (CompanyHouse AG, Lettenstrasse 7, 6343 Rotkreuz, Switzerland; <https://www.companyhouse.de/Datenschutz>)
- **Ecovadis SAS** (43 avenue de la Grande armée, 75116 Paris, France; <https://ecovadis.com/trust-center/data-privacy>)
- **Control Risks GmbH** (Mainzer Landstraße 47, 60329 Frankfurt/Main, Germany; **ReliaQuest, LLC** (Global Corporate Headquarters, 1001 Water St, Suite 1900, Tampa, FL 33602, USA; <https://www.reliaquest.com/privacy-policy/>)
- **Refinitiv Germany GmbH** (Friedrich-Ebert-Anlage 49, 60308 Frankfurt am Main, Germany; <https://www.refinitiv.com/en/products/world-check-kyc-screening/privacy-statement>)

Further information about the data processing by these credit agencies/service providers can be obtained from the respective contact data or internet addresses mentioned above (note: as links on the Internet are constantly being adapted, we cannot guarantee that the links are always up to date).

In addition, we are subject to **regulatory reporting and publication obligations**, the fulfillment of which may require us to disclose data from the present context to authorized third parties (e.g., auditors, supervisory authorities).

**A transfer of personal data to a country outside the European Union (EU) or the European Economic Area (EEA)** will only take place if this is necessary for the fulfillment of the aforementioned purposes and either an adequacy decision of the EU Commission for the respective country is available or if other appropriate data protection guarantees within the meaning of Art. 44 ff. GDPR exist (e.g. EU standard contractual clauses). Such a transfer is

also permissible if an exception under Art. 49 GDPR applies, but in particular if you have consented to the transfer to such a country in accordance with the legal requirements.

## 6. Retention period and deletion of personal data

Your personal data will generally be stored for the duration of the business relationship and subsequently for the fulfillment of statutory retention obligations and justified internal retention reasons.

The data will be deleted as soon as the business relationship has ended, all mutual claims have been fulfilled and there are no further statutory retention obligations or conflicting legal or legitimate reasons for retention (e.g. defense or assertion of legal claims).

The statutory retention obligations in Germany result in particular from the German Commercial Code (§ 257 HGB) and the German Fiscal Code (§ 147 AO) and provide for retention periods of 6 to 10 years. In individual cases, longer retention may be necessary (e.g. in the case of ongoing tax audits or in the context of preserving evidence).

## 7. Your rights

If you have any questions or complaints regarding the processing of your personal data, please feel free to contact us or our Data Protection Officer (see section 1).

According to the GDPR, you have the following rights with regard to the processing of your personal data: You have the **right to information** according to Art. 15 GDPR, the right to **rectification** according to 16 GDPR, the right to **erasure according to** Art. 17 GDPR, the right to **restriction of** processing according to Art. 18 GDPR, the **right to object** according to Art. 21 GDPR and the **right to data portability** according to Art. 20 GDPR. In addition, you have the option of contacting the competent supervisory authority.

### Right to object

Pursuant to Article 21 (1) GDPR, you have the right to object at any time, on grounds relating to your particular situation, against the processing of your personal data which is carried out on the basis of Article 6 (1) letter e GDPR (data processing in the public interest) or on the basis of Article 6 (1) letter f GDPR (data processing necessary for the purposes of legitimate interests). This also applies to profiling based on this provision.

In the event of your objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

**To exercise your aforementioned rights, please contact us by e-mail at:**

Rheinmetall AG, Corporate Compliance - CDD, [tpa@rheinmetall.com](mailto:tpa@rheinmetall.com)

## 8. Necessity of providing personal data

Within the scope of our business relationship, you must provide us with the personal data required for the establishment and implementation of the business relationship and for the fulfillment of the associated contractual and legal obligations. This also includes the data required to carry out the business partner assessments (e.g. via self-disclosure forms). Without this data, we are generally unable to enter into or maintain a business relationship with you.

## 9. Automated decision making

No automated decision-making (including profiling) is carried out in the context of this processing of personal data.

## **10. Data sources**

We process data that we have received directly from you as a business partner or as a person associated with a business partner (e.g. self-disclosure form, entry in the system, transmission of documents). In addition, we also process data that we are permitted to collect from publicly accessible sources (e.g. databases, commercial registers, the press, the Internet, the dark web) or from credit agencies / service providers (see section 5). In addition, we also process data that we are permitted to collect from companies of the Rheinmetall Group.

## **11. Changes to this information / Other**

If there is a material change in the purpose or manner in which we process your personal data, we will update this information in a timely manner and provide you with appropriate notice of the changes.

The terms used herein are not gender-specific.

Status of this privacy information: August 25, 2023