

**TATA STEEL**



**Data Protection Information for Customers**

## Opening chapter naming the controller

We, Hille & Müller GmbH (hereinafter referred to as "we", "us" or "Hille & Müller GmbH") value your interest in our products and services. Your privacy is an important concern of ours. We take the protection of your personal data and their confidential treatment very seriously. Your personal data are processed exclusively under the applicable legal provisions governed by data protection laws, and here especially the General Data Protection Regulation (GDPR). This privacy statement is to inform you of how your personal data are processed by us as well as your data protection rights under our business relationship.

### 1. Controller responsible for data processing and Data Protection Officer

The responsible controller for the processing of data within the meaning of data protection laws is:

Hille & Müller GmbH  
Am Trippelsberg 48  
40589 Düsseldorf  
Telephone number: +49 (0) 211 7950-0  
E-mail address: [tsp.marketing@tatasteelurope.com](mailto:tsp.marketing@tatasteelurope.com)

If you have questions or wish to make a suggestion regarding the protection of data, we are happy to be of help.

Our Data Protection Officer can be reached as follows:

Florian Reichert, Attorney  
Scheja und Partner Rechtsanwälte mbB  
Adenauerallee 136  
53113 Bonn  
Germany  
Tel.: (+49) 0228-227 226 0  
<https://www.scheja-partner.de/kontakt/kontakt.html>  
[www.scheja-partner.de](http://www.scheja-partner.de)

### 2. Object of data protection

Personal data constitute the object of data protection. This refers to any and all information that regard an identified or identifiable natural person (so-called data subject). This includes, but is not limited to: name, postal address, e-mail address or telephone number, but also information that is inevitably incurred in the process of our business relationship with you, such as information regarding the beginning, the end, and the scope of the use.

### 3. Purpose and legal grounds of data processing

In the following we have listed an overview of the purposes and legal basis of the data processing within the context of our business relationship with you.

**Hille & Müller GmbH**  
Am Trippelsberg 48, 40589 Düsseldorf

Legal Domicile: Düsseldorf, HRB 39196, Managing Director: Remco Blaauw, Dirk Hafermaas  
Hille & Müller GmbH is an affiliate of Tata Steel Europe Limited and belongs to its Business Unit Tata Steel Plating

### **3.1 Data processing following your consent**

We process your personal data based on your consent, which we ask you to give to us for each specific purpose separately.

Article 6 (1)(a) GDPR constitutes the basis for the processing of data. You may revoke your consent any time effective for the future. You may declare your revocation using the contact details named under 1.

Based on your consent, we process the following categories of personal data:

- First name, last name, salutation and title
- Name of company and sector
- Position
- Language
- E-mail address
- Date when data were collected on the pages of Hille & Müller GmbH

We will erase the data once you have revoked your consent, or the data are no longer required for the purposes which we pursued and if no legal grounds to the contrary apply. In the case of the latter, we will erase the data once such legal grounds to the contrary have been removed.

### **3.2 Preparation and performance of our business relationship with you**

We process personal data where this is necessary in preparation and for the performance of a contract with you. The purposes depend on the respective contract, and specifically encompass the following:

- The preparation and processing of offers
- The processing of the signed contracts
- Answering enquiries regarding our products and services

Further details regarding the purposes of data processing arise from the respective contract documents. The following categories of personal data are processed for this:

- First name, last name
- Name of company
- Postal address or e-mail address

Article 6 (1)(b) GDPR constitutes the basis for the processing of data. You will need to supply those personal data which are necessary for the preparation and performance of our business relationship with you. Without these data we are unable to process your enquiry or fulfil the contract.

We will erase the data after three years at the latest once the legal obligation no longer applies and provided that no other legal grounds apply. In the case of the latter, we will erase the data once such legal grounds to the contrary have been removed.

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### 3.3 Compliance with legal obligations

We process your personal data also to comply with the legal obligations which we are subject to. The obligations may be inferred from, for example, commercial law, tax law, anti-money laundering law, finance law, or criminal law. Hereby, the purposes of processing result from the respective legal obligation; processing generally serves the purpose of complying with government inspection duties and duties of disclosure.

Article 6 (1)(c) GDPR constitutes the basis for the processing of data. If we collect data by virtue of a legal obligation, you are required to provide such personal data which are necessary to fulfil the legal obligation. Without providing such data we may be unable to process your enquiry.

We will erase the data after ten years at the latest once the legal obligation no longer applies, provided that no other legal grounds apply. In the case of the latter, we will erase the data once such legal grounds to the contrary have been removed.

### 3.4 Protection of legitimate interests

We process your personal data also to protect our legitimate interests and the legitimate interests of third parties. In doing so we pursue the following interests which simultaneously constitute the respective purposes:

- Event management
- CRM management
- Fraud prevention
- Market research
- Answering enquiries that are not relevant to the contract
- Fulfilment and performance of the contract if your employer is our partner to the contract
- Direct marketing unless you objected to this (see item 8)

Article 6 (1)(f) GDPR constitutes the basis for the processing of data. Whenever it is mandatory for you to provide data, we will expressly point this out to you. Without providing such data we may be unable to process your enquiry.

The following categories of personal data are processed for this:

- First name, last name
- Name of company
- Postal address or e-mail address

We will erase the data after three years at the latest once the legal obligation no longer applies and provided that no other legal grounds apply. In the case of the latter, we will erase the data once such legal grounds to the contrary have been removed.

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#### **4. Recipients of personal data**

In-company recipients: At Hille & Müller GmbH only those individuals have access who require such access for the purposes named under item 3.

These are: Sales & Marketing, Central Corporate Services, Controlling, Shipping and Management.

Non-company recipients: We will only forward your personal data to non-company recipients of Hille & Müller GmbH if this is necessary to process or handle your enquiry, if an alternative form of legal permission exists, or if we have received your consent for this.

Non-company recipients may include:

a) Processors

Non-company service providers which we refer to for the provision of services, such as for the technical infrastructure and maintenance of the Hille & Müller GmbH offer or the provision of contract-relevant content. We select these processors with great care and regularly review them to ensure that your privacy is maintained. The service providers may use the data exclusively for the purposes that we specified.

b) Public bodies

Authorities and government institutions such as public prosecutor's offices, courts or fiscal authorities to which we must transmit personal data on overriding legal grounds.

c) Private bodies

Merchants, cooperation partners or assistants to whom data are transmitted based on consent or due to legal grounds.

d) Tata Steel Europe Limited

Tata Steel Europe Limited, as an affiliated company, is a non-company service provider which we refer to for the provision of services, such as for the technical infrastructure and maintenance of the Hille & Müller GmbH offer or the provision of contract-relevant content. We select these processors with great care and regularly review them to ensure that your privacy is maintained. The service providers may use the data exclusively for the purposes that we specified.

#### **5. Data processing in third countries**

If data are transmitted to bodies that either are not domiciled, or which process data at a location that is not in a Member State of the European Union or in another state that is party to the Agreement on the European Economic Area, we ensure prior to said forwarding that apart from exceptions as permitted by law, the recipient can either provide for a reasonable level of data protection (such as by means of an adequacy decision of the European Commission, suitable guarantees, or the agreement of so-called EU standard contractual clauses of the European Union with the recipient) or an adequate consent on your part has been received.

We can furnish you with an overview of the recipients in third countries and a copy of specifically agreed arrangements to safeguard a reasonable level of data protection. To do so, please refer to the information under item 1.

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## 6. Automated individual decision-making and profiling

We do not apply automated individual decision-making or profiling.

## 7. Storage period

For more on the storage period for personal data, please refer to the respective chapter on data processing.

In addition, the following applies in principle: We will store your personal data only for as long as this is required to fulfil the purposes or – in the case of consent – until you revoke such consent. Should you object to this, we will erase your personal data unless their further processing is permitted according to relevant legal provisions. We will also erase your personal data if we are obliged to do so by law.

## 8. Rights of the data subject

As the data subject, you have multiple rights. In detail:

**Right of access to information:** You have the right to obtain information on the data that we have stored on you.

**Right to rectification and to erasure:** You may demand that we rectify incorrect data and – provided that the legal requirements have been met – erase your data.

**Right to restrict the processing of data:** You may demand – provided that the legal requirements have been met – that we restrict the processing of your data.

**Data portability:** If you provided data to us based on a contract or consent you have the right to receive the personal data concerning you, provided that the legal requirements are met, in a structured, commonly-used and machine-readable format or that we transmit those data to another controller.

**Revocation of consent:** If you gave us your consent to process your data, you may revoke such consent at any time effective for the future. This will not affect the lawfulness of the processing of your data until such revocation.

**Right to lodge a complaint with a supervisory authority:** You may lodge a complaint with the responsible supervisory authority if you believe that the processing of your data breaches applicable data protection laws. To do so, you may refer to the competent data protection authorities for your place of residence or your country or the data protection authorities responsible for us.

**How to contact us and exercise your rights:** If you have questions regarding the processing of your personal data, your rights as a data subject, and any possible consent you may have given us, you are free to contact us. To exercise any of your above rights, please contact us by e-mail sent to [tsp.marketing@tatasteelurope.com](mailto:tsp.marketing@tatasteelurope.com) or letter sent to the address named above under item 1. When doing so, please ensure that we can clearly identify who you are. To revoke your consent, you may also choose the means of contact which you used to give such consent.

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**Objection to the processing of data on the grounds of a "legitimate interest":** You have the right to object at any time to our processing of data for reasons resulting from your specific situation if and when this is due to a "legitimate interest". Should you invoke such right to object, we will cease the processing of your data unless we can demonstrate – in accordance with legal requirements – compelling legitimate grounds to further process your data, which override your rights.

**Objections to the processing of data for the purpose of direct marketing:** We also process your personal data on the legal grounds of a "legitimate interest" to pursue direct marketing. You have the right to object to such processing at any time.

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