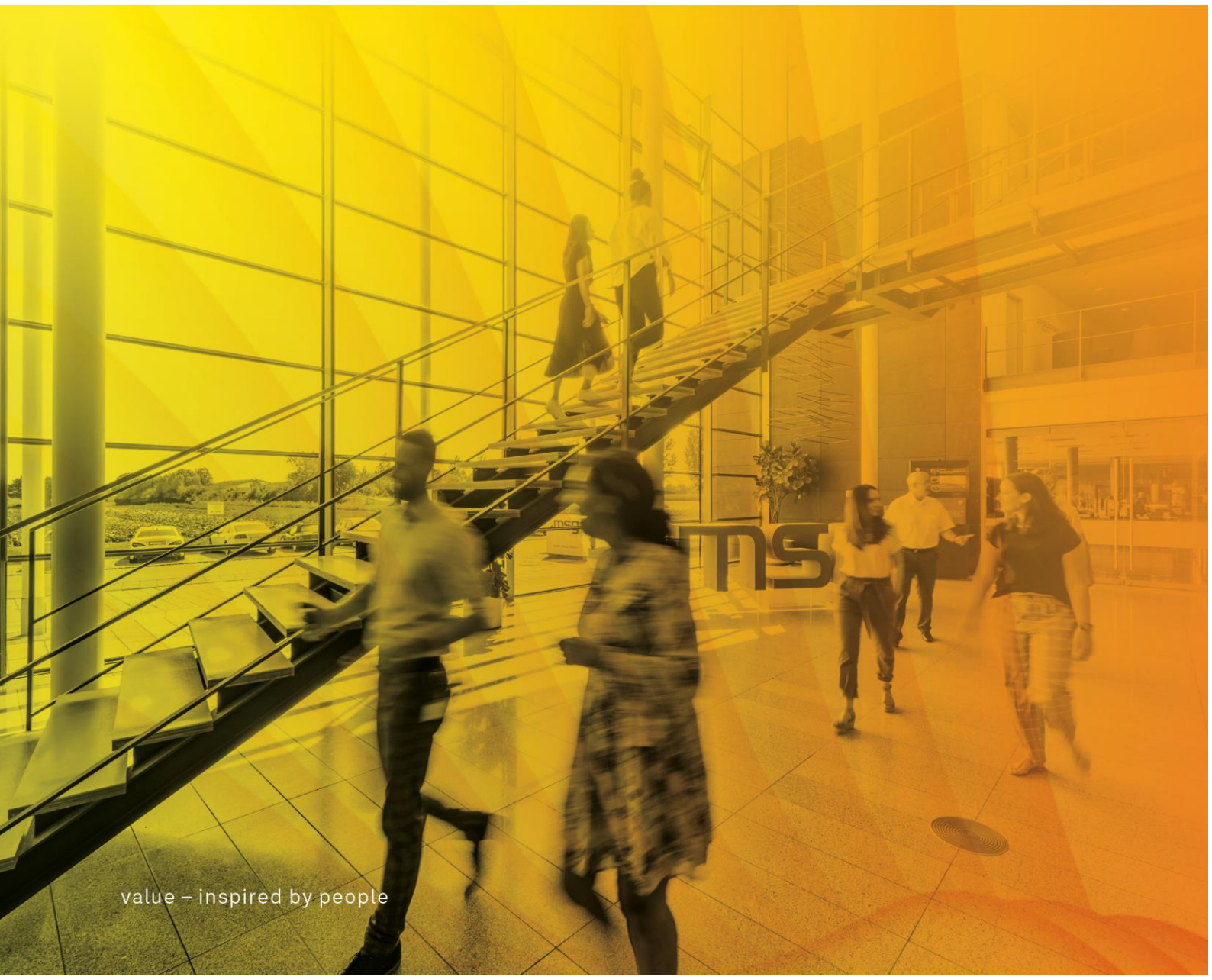




Privacy Policy for Suppliers

msg Gruppe



Data Protection in the msg Supplier Management System

Compliance with data protection regulations, i.e., the General Data Protection Regulation (GDPR), is very important to us. Below, we inform you about the processing of your personal data in connection with our supplier management system.

1. Scope

This privacy policy applies to the following msg Group companies:

- msg systems ag
- msg life ag
- msg for banking ag

2. Name and Address of the Controller

Responsible for the collection, processing, and use of your personal data within the meaning of the EU General Data Protection Regulation is:

msg systems ag
Robert-Bürkle-Straße 1
85737 Ismaning
Deutschland
Telefon: +49 89 96101-0
E-Mail: info@msg.group

msg life ag
Humboldtstraße 35,
70771 Leinfelden-Echterdingen,
Deutschland
Telefon: +49 711 94958-0,
Telefax: +49 711 94958-9949
E-Mail: info@msg-life.com

msg for banking ag
Amelia-Mary-Earhart-Straße 14
60549 Frankfurt am Main
Deutschland
Telefon: +49 69 580 045 – 0
E-Mail: info-banking@msg.group

If you wish to object to the collection, processing, and use of your data by msg in accordance with these data protection provisions in general or for individual measures, you can send your objection by email, fax, or letter to the address above.

3. Name and Address of the Data Protection Officer

The data protection officer of the controller is:

Für msg systems ag:

Claus Bauer
msg systems ag
Robert-Bürkle-Straße 1
85737 Ismaning
Deutschland
Telefax: +49 89 96101-1113
E-Mail: Datenschutz@msg.group

Für msg life ag:

Claus Bauer
msg life ag
Robert-Bürkle-Straße 1,
85737 Ismaning
Deutschland
Telefax: +49 89 96101-1113
E-Mail: Datenschutz@msg.group

Für msg for banking ag:

Claus Bauer
Msg for banking ag
Robert-Bürkle-Straße 1,
85737 Ismaning
Deutschland
Telefax: +49 89 96101-1113
E-Mail: datenschutz-banking@msg.group

4. Definition of Terms

The subject of data protection is the protection of personal data. These are all information relating to an identified or identifiable natural person (so-called data subject).

This includes information such as name, postal address, email address, or telephone number, as well as other information about you that arises in the course of our interaction with you, especially data on the scope of the order and performance.

5. Purposes and Legal Bases of Data Processing

a. Fulfillment of Contractual and Pre-contractual Obligations

We process your personal data to comply with legal obligations to which we are subject. The data processing is based on Article 6(1)(c) GDPR. The obligations may arise, for example, from commercial, tax,

money laundering, financial, or criminal law. The purposes of the processing result from the respective legal obligation; the processing generally serves the purpose of fulfilling governmental control and reporting obligations.

This includes, for example:

- (1) Requesting individual offers for work or services;
- (2) Concluding a service or work contract or executing an order;
- (3) Carrying out central supplier management and obtaining self-assessments;
- (4) Processing inquiries about performed work, services, or products, including handling complaint processes;
- (5) Settling invoices.

b. Fulfillment of Legal Obligations

We process your personal data to comply with legal obligations to which we are subject. The data processing is based on Article 6(1)(c) GDPR. The obligations may arise, for example, from commercial, tax, money laundering, financial, or criminal law. The purposes of the processing result from the respective legal obligation; the processing generally serves the purpose of fulfilling governmental control and reporting obligations.

c. Protection of Legitimate Interests

Furthermore, we process your personal data to protect legitimate interests of us or third parties, unless your interests requiring protection of your personal data prevail. The data processing is based on Article 6(1)(f) GDPR. Processing to protect legitimate interests serves the following purposes or protects the following interests:

- (1) Development of products, services, care services, and other measures for the management of business transactions and processes;
- (2) Risk management, such as obtaining supplier self-assessments;
- (3) Credit checks through data exchange with credit agencies (e.g., SCHUFA);
- (4) Ensuring legal compliance, prevention of and protection against violations of law (especially criminal offenses), assertion of and defense against legal claims, internal and external compliance measures;
- (5) Exercise of house rights, including video surveillance and other measures for building and plant security;
- (6) Ensuring the availability, operation, and security of technical systems and technical data management;
- (7) Responding to and evaluating contact inquiries and feedback.

We always observe the principle of data economy when collecting and processing data and do not collect any personal data that we do not absolutely need in accordance with point no. 4 of this privacy policy.

d. Consent

We process your personal data based on corresponding consent. The data processing is based on Article 6(1)(a) GDPR.

If you give consent, it is always purpose-bound; the purposes of the processing result from the content of your declaration of consent.

You can revoke consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

e. Profiling

We do not carry out automated decision-making or profiling according to Article 22 GDPR.

6. Data Collection from Third Parties

We also process personal data that we receive from third parties or from publicly available sources. Below is an overview of the corresponding sources and the categories of data obtained from these sources.

- a. **Group companies:**
Data about your services, possibly centralized retrieval of services.
- b. **Cooperation partners and service providers:**
Specific data, e.g., credit data from credit agencies.

7. Data Recipients outside the msg Group

Within the msg Group, only those individuals have access to your personal data who need it for the purposes mentioned. We only pass on your personal data to external recipients if there is a legal permission for this or if you have given your consent. Below is an overview of the corresponding recipients:

- a. **Processors**
Group companies or external service providers, for example, in the areas of technical infrastructure and maintenance, who are carefully selected and checked. Processors may only use the data in accordance with our instructions.
- b. **Public authorities**
Authorities and state institutions, such as tax authorities, public prosecutors, or courts, to whom we transmit personal data, for example, to fulfill legal obligations or to protect legitimate interests.
- c. **Private entities**
Group companies and service facilities, cooperation partners, (non-instructional) service providers, or authorized persons such as credit agencies or transport service providers.

8. Data Processing in Third Countries

If data is transferred to locations whose registered office or location of data processing is not in a member state of the European Union, another contracting state of the Agreement on the European Economic Area, or a state for which the European Commission has determined an adequate level of data protection by decision, we ensure before the transfer that the data transfer is either covered by a legal permission, guarantees for an adequate level of data protection exist with regard to the data transfer (e.g., through the agreement of contractual guarantees, officially recognized regulations, or binding internal data protection regulations at the recipient), or you have given your consent to the data transfer.

9. Data Deletion and Storage Duration

Personal data will be deleted or blocked as soon as the purpose of storage ceases to apply. Storage may also take place if this is provided for by the European or national legislator in Union regulations, laws, or other provisions to which the controller is subject. Blocking or deletion of data also takes place if a storage period prescribed by the standards mentioned expires, unless there is a need for further storage of the data for conclusion of a contract or fulfillment of a contract. In the case of storing your personal data, this is the case when the contractual relationship has been permanently terminated and thus the supplier evaluation is no longer carried out. Exceptions to this are explained in the preceding paragraph.

10. Rights of Data Subjects

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights against the controller:

- a. **Right to Information**
You have the right to obtain information free of charge about the extent, origin, and recipients of the stored data as well as the purpose of storage.
- b. **Right to Correction**
You have the right to correction and/or completion vis-à-vis the controller if the processed personal data concerning you is incorrect or incomplete. The controller must make the correction without delay.

c. Right to Deletion

You may request the controller to delete the personal data concerning you without delay, and the controller is obliged to delete this data immediately if one of the following reasons applies:

- (1) The personal data concerning you is no longer necessary for the purposes for which it was collected or otherwise processed.
- (2) You withdraw your consent on which the processing according to Art. 6(1)(a) or Art. 9(2)(a) GDPR was based, and there is no other legal basis for the processing.
- (3) You object to the processing pursuant to Art. 21(1) GDPR, and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21(2) GDPR.
- (4) The personal data concerning you has been unlawfully processed.
- (5) The deletion of personal data concerning you is necessary to fulfill a legal obligation under Union law or the law of the member states to which the controller is subject.
- (6) The personal data concerning you was collected in relation to information society services offered according to Art. 8(1) GDPR.

d. Right to Data Portability

You have the right to receive the personal data concerning you that you have provided to the controller in a structured, common, and machine-readable format. In the case of your stored contact data, you will receive a CSV file with the relevant personal data.

e. Right to Object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is based on Art. 6(1)(e) or (f) GDPR.

The controller no longer processes the personal data concerning you unless the controller can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

You have the right to revoke your data protection consent at any time. The revocation of consent does not affect the lawfulness of processing based on consent before its withdrawal.

f. Right to Lodge a Complaint with a Supervisory Authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the member state of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of personal data concerning you violates the GDPR. The list of the competent supervisory authority can be found under the following link (<https://www.datenschutzkonferenz-online.de/datenschutzaufsichtsbehoerden.html>) at the DSK.

The supervisory authority to which the complaint has been lodged shall inform the complainant about the progress and the outcome of the complaint, including the possibility of a judicial remedy under Art. 78 GDPR.