

Data protection information for the purpose of Heidelberg group- internal refinancing of [contract designation] in accordance with the EU General Data Protection Regulation in Germany

Status: July 2023

The following data protection information provides you with data protection information about our data processing in accordance with Art. 13, 14 of the European Data Protection Regulation (DSGVO).

We, Heidelberger Druckmaschinen AG and all of our affiliated companies and sales partners (hereinafter collectively referred to as "Heidelberg", "we", "us"), take data protection seriously and hereby inform you about the processing of your personal data by us and the rights to which you are entitled in accordance with the data protection regulations. What data is processed in detail and how it is used, depends to a large extent on the services requested or agreed upon.

Please also forward on this data protection notice to all natural persons who are acting as beneficial owners, authorized representatives, agents, or co-obligated persons (e.g., guarantors) towards us.

1. Name and address of the controller within the meaning of the GDPR and address of the Data Protection Officer

The responsible person within the meaning of the DSGVO is:

Heidelberger Druckmaschinen AG
Gutenbergring
69168 Wiesloch, Germany

Phone: +49 (0)6222 82 00
Fax: +49 (0)6222 82 1999
E-mail address: information@heidelberg.com

You can reach our data protection officer at:

Heidelberger Druckmaschinen AG
Data Protection Officer
Gutenbergring, 69168 Wiesloch, Germany

E-mail address: datenschutzbeauftragter@heidelberg.com

2. What sources and data do we use?

We process personal data that we receive during our business relationship or in the course of our customers, their beneficial owners, authorized representatives, agents, co-obligated persons (e.g., guarantors) and other third parties authorized representatives, agents, co-obligated persons (e.g.,

guarantors) and other persons connected with the persons associated with the customer as well as interested parties. In addition, we process to the extent necessary for the provision of our services personal data that we obtain from publicly sources (e.g., land registers, commercial registers and registers of associations, press, and Internet) or which we receive by third parties.

Relevant personal data in the initiation or financing process, as beneficial beneficiary, authorized representative, authorized agent or co-obligor of a financial service financial service (e.g., guarantor) are personal data (e.g., name, address and other contact data, birthday and place of birth and nationality), legitimation data (e.g., ID card data), Authentication data (e.g., signature specimen), and tax ID. In addition, this may also include order data (e.g., payment order), data resulting from the fulfillment of our contractual obligations (e.g., turnover data in payment transactions), information about your financial situation (e.g., creditworthiness data, origin of assets), data for tax purposes, advertising and sales data, documentation data (e.g., consultation protocol and visit notes) as well as any other data comparable to the categories mentioned above.

3. What do we process your data for (purpose of processing) and on what legal basis?

We process the above personal data in accordance with the provisions of the of the DSGVO and the Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG):

a. To fulfill contractual obligations (Art. 6 Par. 1 (b) DSGVO).

The processing of personal data (Art. 4 No. 2 DSGVO) is carried out for the provision of financial services in the context of the performance of our contracts with our customers or for the Implementation of pre-contractual measures, which take place upon request. The purposes of the data processing are generally based on the financial services contracts concluded with Heidelberg (e.g., financial service contracts concluded with Heidelberg (e.g., financial purchase, leasing, rental, purchase of receivables) and may include, among other things, needs analyses, consulting, and the execution of transactions. The further details on the data processing purposes can be found in the respective contract documents.

b. Within the framework of the balancing of interests (Art. 6 Par. 1 f DSGVO).

To the extent as necessary, we process your data beyond the actual performance of the contract for the Safeguarding legitimate interests of us or third parties. Examples:

- Consultation of and data exchange with credit agencies to determine of creditworthiness or default risks;
- Needs analysis for the purpose of directly contacting customers or interested parties;
- Advertising or market and opinion research, to the extent as you have not objected to the use of your data;
- Objected to the use of your data;
- Assertion of legal claims and defense in legal disputes;
- Ensuring the IT security and IT operation of Heidelberg;
- Prevention and investigation of criminal offenses;
- Video surveillance for the preservation of domiciliary rights, for the collection of evidence in the case of robberies and fraud offences;
- Measures for building and facility security (e.g., access controls),
- Measures for business management and further development of services and products;
- Risk management of Heidelberg.

c. Based on your consent (Art. 6 Par. 1 a DSGVO).

To the extent that you give us your consent to process personal data for certain purposes (e.g., for the recording of a telephone conversation or the promotional approach by e-mail or telephone), the lawfulness of this processing is based on your given consent. Any consent given can be revoked by you at any time. This also applies to the revocation of declarations of consent that were given to us before the DSGVO came into force, i.e., before May 25, 2018, have been granted to us. Please note that the revocation only takes effect for the future only. Processing that took place before the revocation is not affected.

d. Due to legal requirements (Art. 6 Par.1 c DSGVO) or in the public interest (Art. 6 Par. 1 e DSGVO)

In addition, we are subject to various legal obligations, as well as regulatory requirements. The purposes of the processing include, among others, creditworthiness check, identity and age check, fraud and money laundering prevention, and reporting obligations under tax law as well as the assessment and management of risks at Heidelberg.

4. Who gets my data?

Within Heidelberg, access to your data is granted to those group companies and departments that need it to fulfill our contractual and legal obligations. Also, third parties employed by us such as service providers and vicarious agents (e.g., Heidelberg employees) may also receive data for these purposes, if they have been obligated to maintain the confidentiality of company and business secrets and comply with the data protection regulations and agreements. These are companies in the categories of financial services, IT services, logistics, printing services, telecommunications, auditors, tax advisors, consulting and advisory services, as well as sales and marketing.

With regard to the transfer of data to recipients outside Heidelberg, it should first of all be that, according to the general terms and conditions agreed between you and us, we are obliged to maintain secrecy about all customer-related facts and evaluations of which we become aware of which we gain knowledge. We are only allowed to pass on information about you if this is required by legal provisions that necessitate this, you have given your consent, we are authorized to provide information and/or processors commissioned by us to have equally ensured compliance with confidentiality as well as the requirements of the DSGVO and/or the BDSG. Under these conditions recipients of personal data may be, for example:

- Public bodies and institutions (e.g., Deutsche Bundesbank, German Federal Financial Services Supervisory Authority, European Banking Authority, European Central Bank, financial authorities, and law enforcement agencies) in the event of a legal or regulatory obligation or official obligation.
- Other credit and financial services institutions or comparable institutions and processors to whom we transfer personal data for the purpose of carrying out the business relationship with your personal data (depending on the contract - e.g., correspondent banks, refinancing partners, credit agencies, IT service providers, data shredders, auditors, auditing service providers, and data screening service providers for anti-money laundering purposes).
- Other companies at Heidelberg for risk management due to legal or regulatory obligation.

Further data recipients may be those bodies for which you have given us your consent for the have given your consent to the transfer of data.

5. Will data be transferred to a third country or to an international organization?

A data transfer to entities in countries outside the European Union and outside the European Economic Area (EEA) takes place, if:

- It is necessary for the execution of your orders (e.g., payment orders);

- It is required by law (e.g., tax reporting obligations);
- You have given us your consent; or
- Within the framework of order processing.

In the case of commissioned processing, the service providers are contractually bound to our instructions and are subject to strict technical and organizational security measures. The purpose limitation and the exclusion of processing the data for our own purposes are expressly agreed.

If we pass on personal data to service providers outside the EEA, the data will only be passed on to the extent that the third country has been confirmed by the EU Commission to have an adequate level of data protection has been confirmed by the EU Commission or other appropriate data protection guarantees (e.g., binding internal company data protection regulations or an agreement of the standard contractual clauses of the of the EU Commission) are in place.

6. How long will my data be stored?

As far as necessary, we process and store your personal data as long as it is required for the fulfillment of our contractual and legal obligations. This also includes the initiation, processing and archiving of a contract. It should be noted that our business relationship is a continuing obligation that is intended to last for years.

If the data is no longer required for the fulfillment of contractual or legal obligations, these are regularly deleted, unless their - limited - further processing is necessary for the following purposes:

- Fulfillment of retention obligations under commercial and tax law: These include the German Commercial Code (HGB), the German Fiscal Code (AO), the German Banking Act (KWG) and the German Money Laundering Act (GwG). The deadlines for documentation are two to ten years after the end of the business relationship or termination of the business relationship.
- Preservation of evidence within the framework of the statutory limitation provisions. According to §§ 195 et seq. of the German Civil Code (BGB), these limitation periods can be up to 30 years, with a regular limitation period being three years.

7. What data protection rights do I have?

Every data subject has, in accordance with the general procedural provisions of Art. 12 of the DSGVO the right to information according to Art. 15 DSGVO, the right to rectification according to Art. 16 DSGVO, the right to erasure pursuant to Art. 17 of the GDPR, the right to restriction of processing pursuant to Art. 18 DSGVO, the right to object under Art. 21 DSGVO and the right to data portability from Art. 20 DSGVO. Regarding the right to information and the right to erasure, the restrictions are pursuant to §§ 34 and 35 BDSG.

To the extent that you have given us your consent to the processing of personal data, this may be revoked at any time in accordance with Art. 7 DSGVO. This also applies to the revocation of declarations of consent that were given to us before the validity of the DSGVO, i.e., before May 25, 2018, were granted to us. Please note that the revocation only takes effect for the future. Processing operations, that took place prior to the revocation are not affected by this (see point 3(c) above).

Data subjects may contact the data protection officer of Heidelberger Druckmaschinen AG for any information relating to the processing of their personal data processing of their personal data and with the exercise of their rights (Art. (Article 38 (4) of the GDPR).

In addition, there is a right of appeal to a competent data protection supervisory authority (Art. 77 DSGVO in conjunction with. § 19 BDSG). The competent supervisory authority for Heidelberger Druckmaschinen AG is:

"The State Commissioner for Data Protection and Freedom of Information",
Königstraße 10a
70173 Stuttgart, Germany

The e-mail address is: poststelle@lfdi.bwl.de

8. Is there an obligation for me to provide data?

Within the scope of our business relationship, you are only required to provide the personal data that is required for the establishment, implementation and termination of a business relationship and the fulfillment of the associated contractual obligations or which we are legally obliged to collect. Without this data, we will generally refuse to conclude the contract or execute the order or the execution of the order or will no longer be able to perform an existing contract and may have to terminate it.

We are obligated under money laundering regulations to identify you before the to identify you on the basis of an identity document before the business relationship is established and to collect name, place of birth, date of birth, nationality, address and identification data and record them.

For us to comply with this legal obligation, you have given us provide us with the necessary information and documents in accordance with the Money Laundering Act and to notify us immediately of any changes that occur in the course of the business relationship. Should you do not provide us with the necessary information and documents, we may not enter the business relationship requested by you.

9. To what extent is there fully automated decision-making?

For the establishment and implementation of the business relationship, we generally do not use any fully automated decision-making pursuant to Art. 22 DSGVO. Should we use this procedure in individual cases, we will inform you separately about this or obtain your corresponding obtain your consent, provided that this is required by law.

10. To what extent will my data be used for profiling?

We process your data automatically in the context of anti-money laundering with the aim, to evaluate certain personal aspects (profiling). Due to legal and regulatory oversight we are obliged to combat money laundering, the financing of terrorism and crimes that pose a threat to assets. In this context, data evaluations are also carried out (e.g., for payment transactions). These measures also serve to protect you.

We use a scoring procedure to assess your creditworthiness. This calculates the probability that a customer will meet his payment obligations in accordance with the contract. The calculation can consider, for example, income, expenses, existing liabilities, occupation, length of service, experience from previous business business relationships and information from credit agencies. The calculated score values support us in our decision-making and are included in ongoing risk management.

11. Information about your right to object according to Art. 21 DSGVO

- Individual right of objection

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is carried out on the basis of Art. 6 Par. 1 letter e DSGVO (data processing in the public interest) and Art. 6 Par. 1 letter f DSGVO (data processing based on a balance of

interests), to object; this also applies to profiling based on this provision within the meaning of Art. 4 No. 4 DSGVO.

If you object, 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 the assertion, exercise, or defense of legal claims.

- Right to object to processing of data for direct marketing purposes

In individual cases, we process your personal data to conduct direct advertising. You have the right to object at any time to the processing of your personal data for the purpose of such data for the purpose of such advertising; this also applies to profiling, to the extent as it is connected with such direct marketing.

If you object to processing for the purposes of direct marketing, we will no longer process your personal data for these purposes. The objection can be made form-free and should preferably be addressed to:

Heidelberger Druckmaschinen AG
Data Protection Officer
Gutenbergring
69168 Wiesloch, Germany
E-mail address: datenschutzbeauftragter@heidelberg.com