



PAUL WURTH S.A. – SUPPLIER E-PORTAL PRIVACY NOTICE

Paul Wurth Group, namely Paul Wurth S.A. and all entities under its control (fully consolidated entities) are committed to preserving the confidentiality, integrity and availability of Personal Data.

With respect to the General Data Protection Regulation (hereinafter referred to as “the GDPR”) entered into force on May 25, 2018, the Paul Wurth Group’s entities established in the European Union (hereinafter referred to as “the Company”) formalize this notice regarding the protection of your Personal Data.

This Privacy Notice outlines how your Personal Data are managed properly to protect your privacy. Please take a moment to read this Privacy Notice so that you know and understand the purposes for which we may collect, use and/or disclose your Personal Data.

Contents

1	Definitions.....	2
2	What are the Personal Data protection principles in force within the Company?	2
3	In which cases should the Company use Personal Data? What is the legal basis for Processing Personal Data?.....	3
4	In which circumstances are the Suppliers required to provide their Personal Data?	3
5	Who are the recipients of the Suppliers’ Personal Data?	3
6	What security measures are implemented to protect the Personal Data?	4
7	How are the Personal Data stored?.....	4
8	What are the Supplier’s rights?	4
9	Contact.....	5
10	Enforcement and amendment	6



1 Definitions

- Personal Data** : *any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, etc.*
- Processing** : *any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.*
- Supplier** : *In the context of the present notice, Supplier means the individual working on behalf of the provider of Paul Wurth and who is generally the provider's contact person for Paul Wurth.*

2 What are the Personal Data protection principles in force within the Company?

All Processing of Personal Data are conducted in accordance with the following data protection principles:

- 1.4.1. Personal Data are processed **lawfully, fairly and transparently**.
Personal Data are always collected and processed in compliance with a particular legal justification (the legal basis). Clear and transparent information is provided to subjects on the Processing of their Personal Data.
- 1.4.2. Personal Data are collected with a **clearly defined purpose**:
Personal Data are collected for specified, explicit and legitimate purposes and cannot be further processed for other purposes.
- 1.4.3. Only Personal Data **strictly necessary** to achieve the chosen purpose are collected or used.
No superfluous Personal Data are collected.
- 1.4.4. The Personal Data are **accurate** and kept up to date.
All reasonable steps are taken to ensure that inaccurate Personal Data are rectified or deleted.
- 1.4.5. A **proportionate duration of Personal Data storage** is guaranteed.
The Personal Data are not retained for longer than is necessary for the achievement of the chosen purpose. They can also be stored or archived for legal prescription periods.
- 1.4.6. The Personal Data are processed and preserved in a manner that ensures their **security** and their **confidentiality**.



3 In which cases should the Company use Personal Data? What is the legal basis for Processing Personal Data?

The Personal Data are processed for the following purposes:

1. Business process execution:
 - purchasing,
 - conclusion and execution of agreements with Suppliers and business partners,
 - external communications;
 - to record delivered services, products and materials to Paul Wurth,
 - finance and accounting,
 - internal management and control,
 - compliance with legal obligations.

These Processing are based on the consent of the Supplier: The consent must always be free, specific, informed and explicit. At any time, the Supplier has the right to withdraw his/her consent for the Processing of his/her Personal Data, by sending an email to: personaldata@paulwurth.com. However, this withdrawal does not affect the validity of the Processing already carried out with the prior consent of the Supplier.

2. Managing premises' access and CCTV (Close Circuit Television) devices: these Processing are based on the legitimate interest of the company regarding the safety of people and property. In this case, the Supplier may object to its data being processed, and this must be taken into account if the protection of its interests takes precedence over the interest of Company owing to a particular personal situation.

The Processing of Supplier's Personal Data is not based on profiling.

4 In which circumstances are the Suppliers required to provide their Personal Data?

Certain Personal Data may be necessary for the conclusion and execution of agreements with the Supplier. The Supplier will be informed during the collection that the Company will not be able to process the application without these data.

5 Who are the recipients of the Suppliers' Personal Data?

For the purposes described above and only in case of a legitimate interest, Suppliers' Personal Data may be communicated to other entities of the Group, or subcontractors (IT solution providers, etc...) or official bodies.

The Company relies on subcontractors who provide sufficient guarantees regarding their compliance with the GDPR and constrain them with obligations of confidentiality and security of Personal Data.



If the recipient is located in a country outside the European Union, the recipient is subject to compliance with local legislation ensuring an adequate level of protection or, for companies established in the United States, is compliant with the Privacy Shield (self-certification mechanism recognized by the European Commission), or commits to ensure this level of protection through the standard contractual clauses for the Personal Data protection adopted by the European Commission.

6 What security measures are implemented to protect the Personal Data?

The solutions used to store and process Personal Data comply with security requirements issued by the General Management and are subject to rigorous validation and audit procedures.

To ensure the security and confidentiality of Personal Data, the Company has implemented technical and organizational measures, including:

- Access control and specific access right to information and operating systems,
- Technical measures to secure the infrastructure (workstation, network, server) and the data (backup).
- Limitation of people authorized to process Personal Data according to the purposes of each Processing.
- Strict confidentiality obligations imposed to IT system account holders, HR department members and subcontractors.
- Procedures in force in case of Personal Data breach.

7 How are the Personal Data stored?

Paul Wurth generally shall retain Personal Data only:

- for the period required to serve the applicable Business Purpose;
- to the extent reasonably necessary to comply with an applicable legal requirement; or
- as advisable in light of an applicable statute of limitations. Paul Wurth may specify (e.g., in an agreement) a time period for which certain categories of Personal Data will be kept.

Throughout the retention period, access to personnel data is strictly limited to those who have the corresponding authorization. At the end of this period, the Personal Data of Supplier will be definitively erased or anonymised.

8 What are the Supplier's rights?

Every Supplier has the following rights. Their assertion cannot pose any disadvantage to the Supplier.

- **Right of access:** the Supplier may request information on which Personal Data relating to him/her has been stored, how the data was collected, and for what purpose. If Personal Data is transmitted to third parties, information must be given about the identity of the recipient or the categories of recipients.



- **Right to rectification:** if Personal Data is incorrect or incomplete, the Supplier can demand the correction or supplementation.
- **Right to erasure:** the Supplier may request his/her data to be deleted if the Processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data Processing has lapsed or ceased to be applicable for other reasons. Existing retention periods and conflicting interests meriting protection must be observed.
- **Right to object:** the Supplier has a right to object to his/her data being processed, and this must be taken into account if the protection of his/her interests takes precedence over the interest of the Company owing to a particular personal situation. This does not apply if a legal provision requires the data to be processed. The Supplier may object to the Processing of his/her data for purposes of advertising without providing the Company with any justification.
- **Right to restrict Processing :** the Supplier can request the restriction of Processing in the following situations:
 - If he/she contests the accuracy of the Personal Data, for the time required to check the accuracy (e.g. in the case of a mistake related to his/her civil status),
 - When the Processing is unlawful and he/she objects to the erasure of the data,
 - When the Personal Data no longer have a reason to be kept,
 - When he/she objects to his/her data being processed for the time required to check whether the legitimate interest of the Company takes precedence over his/her interests.Where the Processing has been restricted, the data can no longer be processed. The method used to restrict the process may vary depending on the situation (temporary move to another file, locking of data, etc...).
- **Right to data portability:** the Supplier is able to receive the Personal Data in a structured, commonly used and machine-readable format and to transmit those data to another company or organisation.

9 Contact

To enforce the rights mentioned in paragraph 8 or to receive further more detailed information, Suppliers are please to contact:

Paul Wurth S.A.
32, rue d'Alsace
L-1122 Luxembourg
LUXEMBOURG
Tel: (+352) 49 70 22 52
@ : personaldata@paulwurth.com

If Company is unable to resolve an inquiry or a complaint, individuals have the right to lodge a complaint with the applicable supervisory authority and in the event that the Supplier wishes to make a complaint about how its Personal Data is being processed by Company, or how its complaint has been handled, the Supplier has the right to lodge a complaint directly with the supervisory authority. The details for this contact are:



Commission nationale pour la protection des données
1, avenue du Rock n' Roll
L-4361 Esch-sur-Alzette
(+352) 26 10 60-1
[Submit a complaint](#)

10 Enforcement and amendment

The charter is applicable as of May 25, 2018.

It may be updated, especially in case of changes in regulations or Processing. Any changes made to this Privacy Policy will become effective immediately.