

Information for customers, suppliers and other business contacts and interested parties concerning the processing of personal data in accordance with Art. 13 and 14 GDPR

Dear Sirs and Mesdames,

With this letter we would like to inform you that we, the

OECHSLER AG
Matthias-Oechsler-Strasse 9
91522 Ansbach
phone: +49 981 1807-0
email: datenschutz@oechsler.com

Your personal data in accordance with the provisions of the European Data Protection Regulation (GDPR) and the Federal Data Protection Act new version (BDSG n. F.) process. Responsible body in the sense of the legislation just mentioned is the OECHSLER AG.

According to the aforementioned statutory provisions, the responsible body has the following information requirements vis-à-vis its customers, business partners and other persons interested in our company (Art. 13 and 14 GDPR).

This privacy policy applies to the processing of personal data by OECHSLER AG and its affiliates located in the European Union as part of the worldwide OECHSLER Group.

For the purposes of this information, the OECHSLER Group includes all companies in which OECHSLER AG directly or indirectly holds more than 50% of the shares (§ 13 AktG). These companies are collectively referred to below as OECHSLER and are listed at the end of this newsletter.

1. Names of the responsible officers

At our company, responsibility for compliance with the provisions of the GDPR resides with the board of directors, which is, at the moment, comprised of the following persons:

Christoph Faßhauer
Dr. Claudius M. Kozlik (Vorsitzender)
Michael Meyer

2. Contact details of our data protection officer and internal data protection coordinator:

Our external data protection officer is:

Attorney Mr Thomas Costard
Rechtsanwaltskanzlei Costard
Bayreuther Straße 11
90409 Nürnberg
phone: +49 911 7903034
email: info@it-rechtsberater.de

Our internal data protection coordinator is:

Mrs Gabriele Menath
OECHSLER AG
Matthias-Oechsler-Straße 9
91522 Ansbach
phone: +49 981 1807-8330
email: g.menath@oechsler.com

3. Categories of personal data

We process primarily the following categories of personal data:

- identification data (e.g. your first name and surname)
- contact details (e.g. your address, telephone number and email address)
- contractual information
- payment and financial information (e.g. account details)
- other voluntarily supplied personal data

4. Sources of personal data

Most likely, you yourself have communicated your personal data to us. In that case, it is important for your personal data to be correct and for you to help us keep them up to date.

It is however also possible that we will acquire personal data from other sources, namely, publicly available information from generally accessible sources (such as the internet, telephone book, commercial registers, etc.).

5. Purpose of processing

We process your data for our own purposes (in particular for contract and payment implementation, customer and account administration, offer creation, reporting, etc.), as well as for the fulfilment of statutory and governmental obligations.

6. Legal basis for processing

The legal basis for the processing of personal data by our company is formed by the EU General Data Protection Regulation (GDPR) and the (German) Federal Data Protection Act / New Version (BDSG n. F.).

In particular, we would like to emphasize the following statutory authorisations in this regard:

- for contractual compliance (Art. 6 section 1 under b GDPR).
- concerning data processing for one's own purposes (Art 6 section 1 under e GDPR).
- in connection with the granting of consent (Art. 6 section 1 under a GDPR)
- in connection with the fulfilment of a statutory obligation (Art. 6 section 1 under c GDPR) or
- in connection with the need to protect the legitimate interests of the responsible or of a third party (Art. 6 section 1 under f GDPR).

7. Concrete recipients / categories of recipient

Your personal data are processed in departments of our company responsible for the implementation of existing contractual relationships or the handling of your requests. The same applies correspondingly to companies affiliated with the OECHSLER Group, with regards to §15 (German) Stock Corporation Act (AktG).

Further, your personal data may be passed on to our external service providers, e.g. those providing payment, infrastructure, system administration, consultation, disposal, data destruction or billing services. Before enlisting their services, we subject all service

providers (contractors) to a thorough assessment. We also conclude an order processing agreement in accordance with Art. 28 GDPR, with each contractor.

In fulfilling your wishes or complying with a statutory obligation, it can under certain circumstances be necessary to pass on your personal data to a third party, e.g., transport and shipping companies, tax consultants, auditors, lawyers, governmental agencies, courts, banks or the (German) Tax Office).

Your personal data can also be passed on to third parties with your explicit consent or subject to your consent.

8. Data transfer to third countries/international organisations

Your data are stored exclusively on secure servers in Germany, with due observance of all relevant data regulations in effect. Solely employees of the responsible are provided with access to your personal data, this for the purpose of implementing your contractual relationship, fulfilling contractual and statutory obligations or fulfilling their respective tasks.

The OECHSLER Group is active world-wide. In the event that, in connection with the processing of personal data in fulfilment of an existing agreement between yourself and ourselves, your data are transferred to countries outside the European Union (EU) or, respectively, the European Economic Area (EEA), or to service providers outside the EU or EEA (so-called third countries), we first acquire assurance of compliance with EU data protection standards for contractual agreements, through the use of EU standard contractual clauses for the transfer of personal data to contractors in third countries.

9. Term of retention

The processing of your data takes place for the duration of the establishment and implementation of a given contractual or supply relationship and for the duration of the continued existence of obligations issuing from said contractual or supply relationship, e.g., a warranty or product guarantee.

Once you have granted the relevant consent to us, we retain your data until you withdraw said consent, in the case that no other legal grounds exist for the processing of your data.

The relevant statutory terms of retention apply to personal data contained in commercial and tax-law documents (e.g., invoices, accounting records and business letters).

10. Your rights as a concerned party

If you have granted consent for the processing of your data, you are entitled at any time to withdraw it with prospective effect (Art. 13 section 2 under c GDPR).

Pursuant to Art. 15 GDPR, you are entitled at any time to receive information regarding our processing of your data. In particular, you may request information concerning the purposes of processing, the categories of the data being processed, the categories of their possible recipients and the planned term of retention.

In addition, you are, pursuant to Art. 16 GDPR, entitled to request rectification in the event that your data is incorrectly reproduced.

Further, you may, pursuant to Art. 17 GDPR, demand deletion of data in the event that

- the storage of the data is no longer required;

- you have withdrawn consent for data processing and there is no other justification for processing;
- you have registered objection to the processing and there are no overriding justified grounds for further processing of your data;
- your data were unlawfully processed or there is a duty under law to delete them under EU or national legislation.

Pursuant to Art. 18 GDPR, you are also entitled to restrict processing in the event that

- you dispute the correctness of the data for a term which allows the responsible officer to review the correctness of the data;
- the processing is unlawful, but you do not wish the data to be deleted;
- there is no longer a purpose for processing, but the data are still required for asserting your statutory rights or
- you have registered objection pursuant to Art. 21 GDPR, but it is yet to be established whether the justified grounds of the responsible take precedence over your interests.

Pursuant to Art. 20 GDPR, you additionally have the right to receive the data in question in a conventional, structured and machine-readable format (data transferability).

Beyond this, you are, under certain conditions, also entitled to immediate transfer by a responsible officer, provided it is technically feasible.

You have the right at any time to object to the utilisation of your data for the aforementioned purposes (Art. 21 GDPR).

Should you wish to withdraw your consent or exercise the aforementioned rights of parties concerned, kindly notify us in writing.

OECHSLER AG
Matthias-Oechsler-Straße 9,
91522 Ansbach

or send us an email to datenschutz@oechsler.com.

11. Right to complain to an oversight body

You are at all times entitled to address a relevant complaint to the relevant oversight body (Art. 77 GDPR).

A list of oversight bodies (for the non-public sector) with their addresses can be found via:

https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

12. Consequences of non-provision

In the context of the business relationship, we require the following personal data:

- data needed for the commencement and implementation of the business relationship
- data required for the fulfilment of the relevant contractual obligations
- data which we are required by law to collect

Without these personal data, we shall be unable to enter into or implement an agreement with you.

13. No automated decision making; no profiling

We make no use of automated decision making, this explicitly includes so-called profiling (Art. 22 GDPR).

14. Notification in the event of a change to the purpose of the data processing

We shall process your personal data solely for the aforementioned purposes. In the event of a change to the purpose of the data processing, we shall notify you about the change in a timely manner prior to further processing.

Yours sincerely,

OECHSLER AG
Board of Directors

List of affiliated companies belonging to the OECHSLER Group located in the territory of the European Union (05/31/2019):

1. OECHSLER AG
Matthias Oechsler Straße 9, 91522 Ansbach
2. OECHSLER Motion GmbH
Gottlieb-Daimler-Straße 8 91522 Ansbach
3. OECHSLER Motion Holding SE
Matthias Oechsler Straße 9, 91522 Ansbach
4. MOS Corporate Service GmbH
Technologiepark 1, 91522 Ansbach
5. OECHSLER Romania s.r.l.
Strada Iancu Jianu, Nr. 25/J., Judetul Arad, 315400 Lipova