

Data protection information pursuant to Article 13, 14 of the GDPR – for Suppliers and purchasing partners –

Last updated: 25/09/2019

Preamble

Diligence and transparency form the foundation of any trust-based partnership with our suppliers and service providers (hereinafter referred to as purchasing partners). Rheinmetall MAN Military Vehicles GmbH's Supplier Portal provides companies with an online method of providing all necessary information for becoming a purchasing partner. Thus, we would like to inform you of how we process your data and how you can exercise your rights as laid out in the European General Data Protection Regulation (GDPR).

The following explains how we collect your personal data whenever you use the RMNV supplier portal and when you are registering to become a purchasing partner. Personal data comprises all data that pertains to you personally, e.g. your name, address, email addresses, user behaviour, etc.

Data controller	Data protection officer of the data controller
Rheinmetall MAN Military Vehicles GmbH Dachauer Strasse 651 80995 Munich, Germany - Hereinafter RMMV - Legal representative(s): Ben Hudson, Executive Director Thorsten Kutz, Executive Director	Rheinmetall MAN Military Vehicles GmbH -Data Protection Officer- Dachauer Strasse 651 80995 Munich, Germany datacompliance_rmmv@rheinmetall.com

1. nature, scope, purposes and legal basis for processing personal data

1.1 General data collection when you visit our supplier portal

When you use the RMMV Supplier Portal for information purposes only, i.e. when you do not register yourself or transmit information in any other way, we collect only the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data that is technically necessary for us to display our website to you and to guarantee its stability and security (the legal basis for this is the legitimate interest pursuant to Art. 6(1)(f) 1 GDPR):

Data	Processing purpose	Storage time
IP address	To display the website on the respective device	Data is deleted once the session has been terminated.
Date and time of page view	To ensure the website operates properly	
Log files	To ensure the website operates properly	

The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, it is not possible for the user to object to this.

Cookies – general information

The RMNV Supplier Portal uses cookies. Cookies are text files that are stored by the internet browser on the user's computer system. If a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables a unique identification of the browser when the website is called up again.

Cookies – differentiating between types of cookies

Technically necessary cookies

Name of the cookie	Processing purpose	Storage time
com.sap.engine.security.authentication.original_application_url	System security	End of session
PortalAlias	Function call	End of session
saplb_*	Measurement of server performance	End of session
JSESSIONID	Session management	End of session
P4T_IDLETIME	Time measurement	1 year
isCookiesEnabled	Setting for cookie status	Session
p4t_main_application	Session ID	Session
P4TIang	User language	1 year
new_uid	User calendar	Session
P4T_calendar_filter	Calendar filter	1 year
grid_filter	Grid filter component	Session
cron	cron request type	Session
P4TActivity_View	Current CRM activity view	10 days
selectedParent	Position in CRM companies tree	Session
forceUpdate	Force update	Session
P4T_RFI_show_values	RFI settings	1 year
P4T_RFI_show_choices	RFI settings	1 year
P4TRedirect	Logout redirect URL	Session
P4TLoginLogo	Display logo	Session
qgfilterID	Filter settings for quality gates	Session

P4T_SSO_UID	SSO ID	5 seconds
P4T_Sso_HASH	SSO hash	5 seconds
P4T_SSO_LOGOUT_URL	SSO redirect	5 seconds
project_list_view	Display project list	Session
P4T_projectlist_order	Order of project list	1 year
P4T_taskstoday_*	Task settings	1 year
srm_var_*	SRM settings	Session
TreeMenuBranchStatus	Status of tree menu	Session
order_report_template_selected	Report template	Session
P4TReload	Refresh page	Session
P4TWindowSize	Size of browser window	1 year

Technically necessary cookies are not absolutely necessary for displaying the website. However, some functions of the RMMV Supplier Portal cannot be used properly without these cookies. Consequently, it is not possible for the user to object to these. These cookies can be deactivated by configuring the corresponding browser setting. These cookies are processed on the basis of legitimate interests pursuant to Art. 6 (1)(f) GDPR.

Cookies for measuring reach

The RMMV Supplier Portal does not set any cookies for marketing purposes or for measuring reach.

1.2 Registering as a purchasing partner

As a supplier, you can register to become a purchasing partner via our RMNV Supplier Portal. We collect and store the following data when you first create your supplier profile in the Supplier Portal:

- Gender, title, last name, first name, email address, username, company name and language skills

We use this data to provide you access to the RMNV Supplier Portal and strictly as part of the registration process and the associated intention to enter into and conclude a contract pursuant to Art. 6(1)(b) GDPR.

1.3 Companies and beneficial owners

Moreover, we conduct a purchasing partner assessment for each of our purchasing partners. To this end, we collect general data relating to the company, the products offered, manufacturing and production quality, environmental impacts and the technology used. We require this information to be able to establish supply relationships. In addition, we collect data relating to the ownership structure. For this, we collect the following personal data of beneficial owners, shareholders and contacts:

- Last name, first name and date of birth (if necessary)

We process this data both to fulfil the legal obligations as per Art. 6(1)(c) GDPR in conjunction with Sections 3 and 11 of the German Money Laundering Act (GwG) and on the grounds of our legitimate interests (see Art. 6(1)(f) GDPR) to definitively identify purchasing partners and their beneficial owners and to be able to evaluate the performance of purchasing partners and the risk of them defaulting on their services. To this end, we also obtain information from third parties. More information on this is detailed in Section 2.1.

1.4 Data pertaining to contacts

We process data pertaining to your employees listed as contacts for enquiries relating to goods and services provided by your company, to the extent that this information is provided. For this, we process the following data:

- Last name, first name, position, email address, telephone number, fax number, company

We process this data on the basis of our legitimate interests (see Art. 6(1)(f) GDPR) so that purchase orders and complaints are processed as quickly as possible.

1.5 Intent to enter into a contract/Contract conclusion

As soon as you have been added as an approved purchasing partner to our supplier portfolio, we use the personal data of your listed contacts to obtain quotes on the goods and services your company provides or to purchase goods or services. For this, we process the following data:

- Last name, first name, position, email address, telephone number, fax number, company

We process this data on the grounds of our legitimate interests or because this data is necessary for concluding a contract or is required as part of the intent to enter into a contract (see Art. 6(1)(f) and Art. 6(1)(b) GDPR) to ensure seamless communication and correct ordering/commissioning processes.

1.6 Obligation to provide data

There is no general obligation to provide data. However, we reserve the right to refuse to register you as a purchasing partner in our pool if information about your company or beneficial owners is missing.

2. Data transfers/Recipients of aforementioned data

2.1 Credit assessments

We transfer company data (company name, legal form, address) to credit bureaus as part of the assessment of a contractual relationship, on the grounds of our legitimate interests (see Art. 6(1)(1)(f) GDPR), for the purposes of a credit assessment and to evaluate information, which is generated by mathematical statistical methods using the aforementioned data, for assessing the risk of payment defaults. This assessment is repeated on a regular basis.

We currently work with Bisnode Deutschland GmbH and Bisnode Marketing GmbH for these activities.

More information on Bisnode Deutschland GmbH and Bisnode Marketing GmbH is available at https://www.bisnode.com/privacy/personal_data/

2.2 Purchasing partner assessments

We also transfer the personal data of the beneficial owners, managing directors and or members of the Executive Board of purchasing partners to selected credit bureaus and Rheinmetall AG as part of our purchasing partner assessment and on the grounds of our legitimate interests (see Art. 6(1)(1)(f) GDPR) for the purposes of assessing the integrity and conflicts of interest of the purchasing partner,

their organs and beneficial owners. However, these assessments are carried out only when a particular value or level of significance is exceeded during purchase orders/commissions. In this case, assessments are then carried out regularly.

We currently work with the following credit bureaus: Bisnode Deutschland GmbH, Bisnode Marketing GmbH and LexisNexis GmbH

Detailed information on the above companies is available as specified in Art. 14 of the GDPR, i.e. information on business and data retention purposes, the data recipients, the right of access by the data subject, the right to erasure and the right to rectification, etc.

More information on Bisnode Deutschland GmbH and Bisnode Marketing GmbH is available at https://www.bisnode.com/privacy/personal_data/

Information on LexisNexis GmbH is available at <https://www.lexisnexis.com/global/privacy/en/article-14-bis.page>

2.3 Data transfers to other companies and organisations of the Rheinmetall Group

Once you are registered with our supplier portfolio, we reserve the right to make the following data above all available to other companies of the Rheinmetall Group, especially organisations of the Vehicle Systems Division:

- Data pertaining to contacts
- Data pertaining to beneficial owners
- Data pertaining to managing directors/members of the Executive Board

By doing so, we make it possible for other companies and organisations of the Rheinmetall Group to find you as an approved purchasing partner and to contact you directly for future orders. A list of all the companies and organisations of the Rheinmetall Group is available on the Rheinmetall AG website at 'https://www.rheinmetall.com/de/rheinmetall_ag/group/locations_worldwide/locations-worldwide.php'.

We base this provision of data on our legitimate interest (see Art. 6(1)(f) GDPR) in applying a uniform standard for our purchasing partners across the entire Group.

As a result of this, companies and organisations outside of the EU/EEA may be able to access your personal data. We have undertaken special measures in accordance with Art. 44 et seq. of the GDPR to safeguard an appropriate level of data protection at the respective companies and organisations.

2.4 Other data transfers

Aside from the above, we will disclose your personal data to third parties only if:

- You have given your express consent
- Disclosure is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest in not disclosing your data that is worthy of protection
- In the event that a legal obligation exists for the transfer
- This is legally permissible and necessary for the execution of contractual relationships with you

3. Duration of data retention

We store your personal data for as long as it is required for fulfilling our legal and contractual obligations.

We will delete your data as soon as its retention is no longer necessary for fulfilling legal or contractual obligations, unless the further processing of your data is necessary for the following purposes:

- To fulfil commercial and tax-related legal retention obligations. To this end, retention periods from the German Commercial Code (HGB) or The Fiscal Code of Germany (AO) shall be stated.
- To retain/preserve evidence subject to the statute of limitations. In accordance with the statute of limitations of the German Civil Code (BGB), these limitation periods can last up to 30 years in some cases. The standard limitation period is three years.

The following also applies:

For employees of our purchasing partners: As a listed contact, your personal data is stored by us in a database and used for the purposes of placing further purchase orders with your employer for as long as your employer or we are interested in upholding a business relationship.

4. Notification of data protection rights

Any data subject has the right of access under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to data portability under Article 20 GDPR and the right to object under Article 21 GDPR. The restrictions pursuant to Sections 34 and 35 BDSG (German Federal Data Protection Act) apply to the right of access and the right to erasure.

5. Notification of the right to lodge a complaint

In addition, you have the right to lodge a complaint with the relevant data protection supervisory authority regarding the processing of your personal data by us. A list of the supervisory authorities is available on the website of the German Federal Commissioner for Data Protection and Freedom of Information (BfDI) at

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

6. Notification of the right to withdraw consent

You are entitled to withdraw your consent to the processing of your personal data by us at any time. This also applies to the withdrawal of declarations of consent granted to us before the General Data Protection Regulation came into effect, i.e. before 25 May 2018. Please note that a withdrawal of consent cannot be applied retrospectively. It does not apply to the processing of data which took place before consent was withdrawn.

7. Obligation to inform uninvolved third parties

The person that provides the personal data of employees, managing directors, members of Executive Boards or other beneficial owners is obligated to provide the parties affected with the above information regarding data protection as per Art. 13 of the GDPR (supplier registration) such that these are informed about the type, scope and purposes of the data processing involved.

8. Changes to this information

We reserve the right to amend or adapt this information at any time, in compliance with the applicable data protection regulations.