

## **External privacy notice VSMPO TiRus GmbH**

This privacy notice applies to external partners of VSMPO TiRus GmbH. With external business partners we mean customers, potential customers, suppliers, subcontractors, service providers and authorities. We guarantee that we will only process personal data in ways described here and in a way that is consistent with our obligations and your rights under the “GDPR” General Data Protection Regulations (EU Regulation 2016/697).

### **1. Information about VSMPO TiRus GmbH being the „controller“ of data**

VSMPO TiRus GmbH, reference-nr. HRB 47196 Amtsgericht Frankfurt am Main, Germany.

Postal address: VSMPO TiRus GmbH, Carl-Benz-Str. 39-41, D-60386 Frankfurt am Main.

Contact person: Mr. Matthias Deckelmann (Data Protection Officer)

Contact data: +49-(0)69-90 54 77 292 or via email [dataprotection@vsmpto.de](mailto:dataprotection@vsmpto.de)

### **2. What is covered by this privacy notice ?**

This document explains how we use, or in terms of the GDPR „process“, your personal data. „Processing“ means e.g. collection, reception, organization, storage, transfer, deletion of your data. This document will further show the legal basis for our processing your data and will explain your rights relating to your personal data.

### **3. What are personal data?**

Personal data is any information that enables you to be identified. Personal data processed by VSMPO Tirus GmbH covers your name, business contact details, work address, and any other details required for business purposes (see Part 5).

### **4. What are your rights?**

According to the GDPR, you - being the so-called „data subject“ - have the following rights which we will always work to uphold:

- a) The right to be informed about our collection, reception and use of your personal data.
- b) The right to access the personal data we hold about you (see Part 9).
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the contact details above.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the contact details above.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability – n/a, we don't do this.
- h) Rights relating to automated decision-making and profiling – n/a we don't do this.

For more information you may anytime contact us under the contact details above. You have the right to complaint to the supervisory agency if required, who can be contacted at <https://datenschutz.hessen.de/>

#### **5. What personal data are processed by VSMPO TiRus GmbH?**

We process only business data such as:

- Family name, given name
- Company address
- Company email address
- Company telephone & fax number
- Business name
- Job title (function)

We receive your business data usually from you directly either in your email signature, in letters, faxes or through your business card (see further Part 8 data share/transfer).

#### **6. How does VSMPO TiRus GmbH use your personal data?**

The GDPR requires that controllers/ processors must always have a lawful basis for using personal data. In our case, the prevalent legal basis is of course the exercise of our contracts, orders or other business agreements. Here are the purposes of data processing:

- Sales and shipment activities
- Purchasing activities
- Marketing activities and market research
- Claim management
- Communication with you, e.g. responding to letters or emails from you

VSMPO TiRus GmbH commits to Art. 5 GDPR (principles of data processing):

- Lawfulness, fairness, transparency
- Purpose limitation and data minimisation
- Accuracy of the data
- Storage limitation
- Integrity, confidentiality and security of the data

#### **7. How long will VSMPO TiRus GmbH keep your personal data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept as long as VSMPO TiRus GmbH is obliged to archive the corresponding documents bearing your personal data as required by the final customer, the commercial, tax or customs authorities.

## **8. How and where does VSMPO TiRus GmbH store your personal data ?**

### **And are they being shared or transferred ?**

Your contact person(s) at VSMPO TiRus GmbH save your business contact data in their Microsoft Outlook account and/or physically keep your business cards. Your personal data in our commercial documents (e.g. RFQ, offers, contracts, sales or purchasing orders) are stored safely on our secured file server and/or our ERP-system.

We share your personal data (e.g. family name, given name, business address and contact data, function) within the group of companies of which we are a part:

- Ordering of mill products with our mill and mother company PSC VSMPO-AVISMA Corp., Russia & order processing via our sister company VSMPO TiRus SA.  
[Personal data in e.g. RFQ, call for tenders, offer, PO, contract, etc.]
- Exchange of contact data for communication reasons and/ or marketing.  
[Personal data in e.g. emails, letter heads, business cards, etc.]
- Claim management.  
[Personal data in e.g. emails, claim letters, technical documents, etc.]
- Application for Visa for visits to the mill in Russia.  
[Personal data in a letter of invitation applied for by PSC VSMPO-AVISMA Corp. and issued by the Russian Ministry of Immigration]

We have taken additional steps on the group level to ensure that your personal data is treated just as safely and securely as it would be within Germany under the GDPR.

## **9. How can you access your personal data “subject access request”?**

If you want to know what personal data we have about you, you can ask us in writing for details of that personal data, the category of documents they are in, and if necessary and applicable a copy (where any such personal data is held). We have the right to request a EUR10 fee for administration. We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it.