

## BUSINESS PARTNER DATA PROTECTION NOTICE

This data protection notice for applicants informs you about the processing of your personal data at NGC Transmission Europe GmbH.

In accordance with Art. 4 lit 1 of the GDPR, your personal data includes all information that relates or can be related to your person, in particular by assigning it to an identifier such as a name or to an organization or customer number with which your person can be identified.

We provide this Business Partner Data Protection Notice ("**Notice**") to explain our practices as the responsible controller regarding the processing of personal data relating to our vendors, customers, suppliers, and business partners (collectively, "**Business Partners**") and our Business Partners' employees.

### Scope

This Notice applies to you if you are a Business Partner of NGC Transmission Europe GmbH as an individual (e.g., a consultant or sole entrepreneur) or if you are an employee of a Business Partner who interacts with NGC Transmission Europe GmbH on such Business Partner's behalf.

### Categories of Personal Data and Source

Die NGC Transmission Europe GmbH processes the following categories of personal data about you from you or from authorized third parties (e.g., your supervisor, public authorities or public resources):

- **Personal data relating to Business Partners who are individuals:** name, business contact details, services or goods provided or offered, contract details, content of communication (such as email or business letters), payment information, invoice information, and business relationship history
- **Personal data relating to an employee of a Business Partner:** name, business contact details, employer name, title/position, and content of communication (such as email or business letters)

### Processing Purposes, Legal Basis, and Consequences

Your personal data is processed for purposes of performing the contractual relationship with the Business Partner (including fulfilling the contractual obligations, invoice processing, communication, and legal and compliance activities), for purposes of marketing and CRM activities, and for security and fraud prevention activities. NGC Transmission Europe GmbH relies on the following legal grounds for such processing activities:

- performance of the contractual relationship with the Business Partner (Art. 6 lit. b GDPR) ;

- legitimate interest of NGC Transmission Europe GmbH, NGC Transmission Europe GmbH's affiliates or other third parties (such as governmental bodies or courts) (Art. 6 lit. f GDPR), The legitimate interest could be in particular group-wide information sharing, marketing and CRM activities, prevention of fraud, misuse of IT systems, or money laundering, operation of a whistleblowing scheme, physical security, IT and network security, internal investigations, or potential merger and acquisition activities;
- consent (Art. 6 lit. a GDPR);
- compliance with legal obligations (Art. 6 lit. c GDPR);

The provision of personal data is necessary for the conclusion and/or performance of the Business Partner contract, and is voluntary. However, if you do not provide personal data, the affected Business Partner management and administration processes might be delayed or impossible.

### **Categories of Recipients**

Die NGC Transmission Europe GmbH may engage service providers, acting as processors, in order to provide IT and other administrative support (e.g., service providers who provide account payable support or IT hosting and maintenance support). Those service providers may have access to your personal data to the extent necessary to provide such services.

Furthermore, NGC Transmission Europe GmbH may transfer your personal data to its parent entity, Nanjing High Accurate Drive Equipment Manufacturing Group Co. Ltd., in China befindetet, for the purpose of simplifying business processes.

- That means specifically:
- Support for processing in operational management, management and analysis of customer relationships and interactions and related general IT support
- By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses, which are accessible, or taking other measures to provide an adequate level of data protection, we have established that Nanjing High Accurate Drive Equipment Manufacturing Group Co. Ltd. will provide an adequate level of data protection.

Any access to your personal data is restricted to those individuals that have a need to know in order to fulfill their job responsibilities.

NGC Transmission Europe GmbH may also disclose your personal data as required or permitted by applicable law to governmental authorities, courts, external advisors, and similar third parties.

### **Retention Period**

Your personal data is stored by NGC Transmission Europe GmbH and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When NGC Transmission Europe GmbH no longer needs to use

your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless we need to keep your information, including personal data, to comply with legal or regulatory obligations to which NGC Transmission Europe GmbH is subject, e.g. statutory retention periods which can result from Commercial Code, the tax law or the money laundering law and usually contain retention periods from 5 to 10 years, or if we need it to preserve evidence within the statutes of limitation, which is usually 3 years but can be up to 30 years.

## Your Rights

If you have declared your consent regarding certain types of processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

According to the applicable data protection laws you have the following rights:

- **Right of access, Art. 15 GDPR**  
You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data.
- **Right to rectification, Art. 16 GDPR**  
You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure (right to be forgotten), Art. 17 GDPR**  
Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.
- **Right to restriction of processing, Art. 18 GDPR**  
Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.
- **Right to data portability, Art. 20 GDPR**  
Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.
- **Right to object pursuant to Art. 21 General Data Protection Regulation**

You have the right to object on grounds relating to your particular situation, at any time to the processing of your personal data concerning you which is based on Art. 6 (1) lit. e and f GDPR and we can be required to no longer process your personal data.

As NGC Transmission Europe GmbH processes and uses your personal data primarily for purposes of carrying out the contractual employment relationship with you, NGC Transmission Europe GmbH will in principle have a legitimate interest for the processing which will override your restriction request

To exercise your rights please contact us as stated in the "Questions" section below.

### **Complaint to the supervisory authority for breaches of data protection**

You have the right to complain to the competent supervisory authority if you believe that the processing of your data is not permitted under data protection law. This follows from Art. 77 GDPR. The complaint to the supervisory authority may be made informally.

### **Automated decision-making:**

Die NGC Transmission Europe GmbH does not engage in automated decision-making in the context of applications.

### **Questions**

NGC Transmission Europe GmbH's data protection officer can be contacted at: [dataprotection-ngc@add-yet.de](mailto:dataprotection-ngc@add-yet.de).