

EXTERNAL PRIVACY NOTICE

I. This Notice

This Notice is issued by each of the controller entities listed in Section II below (together, “Rain Carbon”, “we”, “us” and “our”) and is addressed to individuals outside our organisation with whom we interact, including customers, visitors to our Sites, other users of our products or services, and visitors to our premises (together, “you”).

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

II. Responsibility for data processing and contact

For the purposes of this Notice, the relevant Controllers are:

Controller Entity	Contact Details
Rain Carbon GmbH	GDPR.DE@raincarbon.com Kekuléstr. 30, 44579 Castrop-Rauxel, Germany +49 2305 / 705-0
RÜTGERS Holding Germany GmbH	GDPR.DE@raincarbon.com Varziner Str. 49, 47138 Duisburg, Germany +49 203 / 4296-03
RÜTGERS Germany GmbH	GDPR.DE@raincarbon.com Kekuléstr. 30, 44579 Castrop-Rauxel, Germany +49 2305 / 705-0
RÜTGERS Gewerbeimmobilien GmbH & Co. KG	GDPR.DE@raincarbon.com Kekuléstr. 30, 44579 Castrop-Rauxel, Germany +49 2305 / 705-0
RÜTGERS Wohnimmobilien GmbH & Co. KG	GDPR.DE@raincarbon.com Kekuléstr. 30, 44579 Castrop-Rauxel, Germany

	+49 2305 / 705-0
RÜTGERS Resins BV	GDPR@raincarbon.com Molenlaan 30, 1422 ZA Uithoorn, Netherland +31 297 545 522
Rain Carbon BVBA	GDPR@raincarbon.com Vredekaai 18, 9060 Zelzate, Belgium +32 93458831
VFT France S.A.	GDPR@raincarbon.com Immeuble Le Narval - BP 3, Parc d'Activités du Bord des Eaux, 62251 Hénin Beaumont Cedex, France +33 321 08 19 80
RÜTGERS Poland Sp. z.o.o	GDPR@raincarbon.com ul Szkolna 15, 47-225 Kedzierzyn-Kozle, Poland +48 77 472 4700

The Data Protection Officer for our German controller entities, and the Data Protection Coordinator for our non-German controller entities, are contactable using the details set out in the table above.

III. Sources and use of data

We process personal data that we have received within the scope of our business relationships from suppliers, customers, potential customers, service providers and agents.

We collect or obtain personal data when persons visit any of our Sites or use any features or resources available on or through a Site.

We also process the personal data of employees of our companies and personal data that we have received from other companies of the Rain Carbon group.

In addition, we process personal data that we have received in a permissible manner from public sources (e.g. commercial registers, land registers, records of debtors, the press, media, Internet) and are permitted to process.

The primary types of personal data we may collect and process are:

- Master data on persons (last name, first name, title, form of address, date of birth, address)
- Communication data, such as phone, mobile phone, fax, and e-mail (home and work)
- Bank information
- Customer, supplier, service provider, agent information (orders, contracts, address data, account data and so on)

IV. Purpose and lawful basis of processing

The processing of the personal data takes place in accordance with the provisions of the General Data Protection Regulation and the specific data protection laws that are relevant and applicable to the Rain Carbon companies within the EU. In processing personal data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

1. Article 6(1)(a) GDPR

To the extent that the data subject has given us consent to the processing of the personal data, the processing thereof is lawful based on the consent granted. Consent can be withdrawn at any time. A withdrawal thereof applies to the future only.

2. Article 6(1)(b) GDPR

The processing of personal data is necessary for the fulfillment of contracts to which the subject is a party or for the implementation of precontractual measures between the parties to the contract and for the handling of customer and supplier relationships involving the subject.

The details regarding the purpose of processing of personal data are set out in the relevant contract documents, customer and supplier documents, and standard business terms.

3. Article 6(1)(c) GDPR

We as a company are subject to various legal obligations, such as tax laws, emission regulations, safety and security ordinances, provisions of commercial and corporate law, and financial regulations. Processing of personal data may also take place to fulfill these provisions.

4. Article 6(1)(f) GDPR

To the extent necessary, we process your data beyond the actual fulfillment of contracts and customer and supplier relationships in order to safeguard our legitimate interests or those of third parties, and that legitimate interest is not overridden by the interests, fundamental rights, or freedoms of the relevant data subjects.

The purposes for which we may process personal data, subject to applicable law, include:

1. Provision of Sites, products, and services

Providing our Sites, products, or services; providing promotional items upon request; and communicating with persons in relation to those Sites, products, or services.

2. Operating our business

Operating and managing our Sites, our products, and our services; providing content to you; displaying advertising and other information to you; communicating and interacting with you *via* our Sites, our products, or our services; and notifying you of changes to any of our Sites, our products, or our services.

3. Communications and marketing

Communicating with you *via* any means (including *via* email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; maintaining and updating contact information where appropriate; and obtaining prior, opt-in consent where required.

4. Management of IT systems

Management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems.

5. Health and safety

Health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations.

6. Financial management

Sales; finance; corporate audit; and vendor management.

7. Security

Physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details).

8. Investigations

Detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

9. Legal proceedings
Establishing, exercising and defending legal rights.
10. Legal compliance
Compliance with our legal and regulatory obligations under applicable law.
11. Improving our Sites, products, and services
Identifying issues with our Sites, our products, or our services; planning improvements to our Sites, our products, or our services; and creating new Sites, products, or services.
12. Fraud prevention
Detecting, preventing and investigating fraud.
13. Recruitment and job applications
Recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.

V. Who receives the data

Within the Rain Carbon group, those bodies that require the data in order to fulfill their contractual and statutory obligations receive access to the data.

Agents in the performance of our contractual obligations and vicarious agents or service providers used by us can also receive access to the data provided that they uphold our instructions on data protection law.

This primarily concerns the following segments:

- Public bodies and institutions (e.g. tax authorities, supervisory authorities, customs authorities), to the extent that we are under a statutory or official obligation.
- Other institutions and processors to which personal data are transferred to implement the business relationships, e.g. EDP/IT applications, archiving, controlling, compliance, purchasing/procurement, media technology, marketing, reporting, legal register, telephony, video systems, audits, payment tools.

These institutions and bodies can also be recipients of data for which consent to the transfer of data has been granted.

VI. Third countries and international organizations

A transfer of data to countries outside the EU or EEA ("third countries") takes place only to the extent that this is necessary to perform obligations (e.g. banks, logistics companies), is required by law (e.g. reporting stipulations under tax or customs law), or you have given us your consent or within the scope of processing on our behalf. To the extent that the transfer takes place to third countries that are not Adequate Jurisdictions

(i.e. a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for personal data), this is done on the basis of template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission (“Standard Contractual Clauses”). You are entitled to request a copy of our Standard Contractual Clauses using the contact details provided in Section II above.

VII. Duration of storage of data

We process and store your personal data as long as is necessary in order to fulfill our contractual and statutory obligations. Because business relationships can also be based on ongoing obligations, the storage thereof may last for a longer period.

If the need to process or store the data for contractual and statutory obligations ceases to apply, the data are regularly erased, with the following exceptions:

- Processing and storage is necessary to comply with storage periods under commercial and tax law. The data are erased as soon as the time limits provided therein have elapsed.
- Preserving evidence within the scope of provisions on limitation of claims, which can last up to 30 years depending on the statutory provision.

VIII. Data protection rights of data subjects

Every data subject has the following rights:

1. Article 15 GDPR: right to access
The right to request access to, or copies of, your personal data in respect of which we are the controller (“Relevant Personal Data”), together with information regarding the nature, processing and disclosure of those Relevant Personal Data.
2. Article 16 GDPR: right to rectification
The right to request rectification of any inaccuracies in Relevant Personal Data.
3. Articles 17 & 18 GDPR: right to erasure and restriction of processing
The right to request, on legitimate grounds: (i) erasure of Relevant Personal Data; or (ii) restriction of processing of Relevant Personal Data;
4. Article 20 GDPR: right to data portability
The right to have certain Relevant Personal Data transferred to another controller, in a structured, commonly used and machine-readable format, to the extent applicable.
5. Article 21 GDPR: right to object.
See Section IX below for further information.

Subject to applicable law, you may also have the following additional rights regarding the processing of your Relevant Personal Data:

- the right to object, on grounds relating to your particular situation, to the processing of your Relevant Personal Data by us or on our behalf; and
- the right to object to the processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.

In the case of the right to access and right to erasure, the restrictions stipulated in the respective data protection laws of the individual Member States apply. In addition, the data subject has the option to lodge a complaint with the data protection supervisory authority.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our processing of personal data, please use the contact details provided in Section II above. Please note that:

1. in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
2. where your request requires the establishment of additional facts (e.g., a determination of whether any processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

IX. Information on the right to object pursuant to Article 21 GDPR

“The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions.² The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data

concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

X. Data security

We have implemented appropriate technical and organisational security measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect personal data, we cannot guarantee the security of data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any personal data that you send to us are sent securely.

XI. Data accuracy

We take every reasonable step to ensure that:

1. personal data that we process are accurate and, where necessary, kept up to date; and
2. any personal data that we process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your personal data.

XII. Data minimization

We take every reasonable step to ensure that personal data that we process are limited to the personal data reasonably necessary in connection with the purposes set out in this Notice.

XIII. Cookies and similar technologies

We use cookies in some areas of our websites. Cookies are small text files that enable us to make our services available to you on a more individual basis during your visit.