

Information on data protection for our business partners

In connection with our business activities, we, Westlake Vinnolit GmbH & Co KG, process personal data of our (potential) business partners and their employees.

The protection of personal data is an important concern for us. We process personal data only in accordance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

In the following, you will find information about us and our data protection officer. We would also like to give you an overview of the processing of your personal data and your rights in relation to the processing.

For more information about the processing of your personal data and your rights in relation to the processing, please see our detailed privacy information on our website:

<https://www.westlakevinnolit.com/en/privacy/>

Who is responsible for data processing?

Westlake Vinnolit GmbH & Co KG
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How can you reach our data protection officer?

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For what purposes and on what legal basis do we process personal data?

We process personal data of our (potential) business partners and their employees for the following purposes:

- Identify potential business partners (leads) and initiate business relationships, including making initial contact with the aim of establishing a business relationship.
- Identification of our business partners
- Execution of compliance screenings for the fulfilment of legal obligations (e.g. sanctions list check)
- Implementation of pre-contractual measures including pre-contractual communication and preparation of offers and cost estimates
- Assessing the creditworthiness of our customers and setting and monitoring our customers' credit limits
- Fulfilment of contracts with our business partners including contractual communication, exchange of services, invoicing and payment processing
- Proper accounting and storage for the fulfilment of contractual and legal, in particular commercial and tax law, storage obligations

- Transfer of information to our parent company to ensure its compliance with legal obligations
- storage for evidence purposes for the possible assertion, exercise or defence of legal claims
- assertion, exercise or defence of legal claims, including cooperation with external lawyers or support by other companies of our group of companies
- Cooperation with external tax advisors and/or auditors for the fulfilment of legal obligations
- Cooperation with supervisory authorities, courts and other public bodies to fulfil legal obligations
- Business relationship management including contacting our business partners for information and maintaining the relationship with our business partners and matching our services to the needs and wishes of our business partners
- Data protection compliant deletion, destruction or anonymisation of personal data

Depending on the purpose of processing, the following legal bases apply to data processing:

- Art. 6 (1) (b) GDPR (performance of contracts with data subjects / implementation of pre-contractual measures)
- Art. 6 (1) (c) GDPR (fulfilment of legal obligations)
- Art. 6 (1) (f) GDPR (protection of legitimate interests of us or of third parties under balancing of interests)
- Art. 6 (1) (a) GDPR (consent)

What personal data do we process?

We process the following categories of personal data, but of course only to the extent necessary for the above-mentioned purposes:

- Lead data (e.g.: Company, industry, name, function and business contact data of potential business partners).
- Master data (e.g.: Company, industry, registration number, VAT identification number and business identification number of business partners).
- Identification data (e.g.: details of the beneficial owner of our business partners)
- Contact details (e.g.: Name, function and operational contact data of the contact persons at our business partners).
- Bank details (e.g.: account holder, bank institute, IBAN, BIC of our business partners)
- Communication data (e.g.: Contents of business communication, circumstances of business communication)
- Credit assessment data (e.g.: credit reports provided by credit agencies)
- Contract data (e.g.: data from contract documents)
- Invoice data (for example: invoice date, invoice amounts, invoice items)
- Payment data (e.g.: payment date, payment amounts)
- Log data (e.g.: Data from logs about business content of appointments and meetings).
- Analytical data (e.g.: data from analyses of the business structure of companies)
- Survey data (e.g.: Responses to our surveys for voluntary assessment of the business relationship).

Who receives personal data from us?

The following categories of recipients receive personal data from us, but of course only to the extent necessary for the above-mentioned purposes:

- Other companies in our group (including in the USA) and our dependent subsidiaries (including in Russia)

The Westlake Group, to which Westlake Vinnolit GmbH & Co. KG belongs, is a globally active company with headquarters in the USA. In order to meet the needs of its customers, many of which are also international companies, the Westlake Group operates with a matrix organisation and may require an exchange of information between different Westlake companies, in particular with the group headquarters Westlake Corporation in the USA. This exchange of information is legitimized by concluded EU standard contractual clauses.

- Companies and service providers cooperating with us outside our group of companies
- Identification service provider
- Shipping service provider
- Billing and payment processing service provider
- Accounting service provider
- Archiving service provider
- Disposal service provider
- Survey service provider
- Signature service provider
- Credit bureaus
- Courts
- Lawyers
- Tax consultant
- Certified Public Accountant
- Regulatory authorities and other public bodies

How long do we store personal data?

As a matter of principle, we only store personal data for as long as is necessary to achieve the above-mentioned purposes. Depending on the type of data, there may be statutory retention obligations that make it necessary to retain the data even if the actual processing purpose for which we collected the data has already been fulfilled. For documents relevant under commercial and tax law, statutory retention periods of six or ten years typically apply (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).

What rights do you have in relation to the processing?

As a data subject, you have the following rights in relation to the processing of your personal data:

- **Right of access (Art. 15 GDPR)**
The right of access to your personal data processed by us and to certain other information (such as that given in this privacy statement).
- **Right of rectification (Art. 16 GDPR)**
If your personal data is inaccurate or incomplete, you have a right to rectification.
- **Right to erasure ("right to be forgotten") (Art. 17 GDPR)**
On the basis of the so-called "right to be forgotten", you can request the deletion of your personal data, unless there is a retention obligation. The right to erasure is not a right without exception. For example, we have the right to continue to process your personal data if such processing is necessary to comply with our legal obligations or to assert, exercise or defend legal claims.

- **Right to restriction of processing (Art. 18 GDPR)**
This right includes the restriction of the use or the manner of use. This right is limited to specific cases and exists in particular if: (a) the data is inaccurate; (b) the processing is unlawful and you object to erasure; (c) we no longer need the data but you need the data to assert, exercise or defend legal claims. If processing is restricted, we may continue to hold the data but not use it. We keep a list of those who have exercised the right to restrict processing in order to be able to ensure this restriction.
- **Right to data portability (Art. 20 GDPR)**
This right includes that we transfer your personal data, if technically possible, in a structured, common and machine-readable format for your own purposes.
- **Right to object (Art. 21 GDPR)**
You may object to the processing of your personal data if it is processed on the basis of legitimate interests. As a data subject, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you carried out on the basis of Article 6(1)(e) or (f) of the General Data Protection Regulation, including profiling based on those provisions.
- **Right to withdraw consent (Art. 7 (3) GDPR)**
If the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation, you as the data subject have the right to withdraw your consent at any time pursuant to Article 7(3) of the General Data Protection Regulation. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation. We will inform you of this before you give your consent.
- **Right to complain to a supervisory authority (Art. 77 GDPR)**
As a data subject, you have the right to lodge a complaint with a supervisory authority under the conditions of Article 77 of the General Data Protection Regulation.

State: May 2022