

# **Data Privacy Statement**

As of: 05 June 2018

The Aluminium Rheinfelden Group would like to thank you for visiting our website and for your interest in our company and our products. The following statement provides you with information about the collection of personal data when using our websites

- http://alurheinfelden.com/de/ (Aluminium Rheinfelden Alloys GmbH)
- <u>www.rheinfelden-alloys.eu</u> (Aluminium Rheinfelden Alloys GmbH)
- www.rheinfelden-semis.eu · (Aluminium Rheinfelden Semis GmbH)
- www.rheinfelden-carbon.eu ( Rheinfelden Carbon Products GmbH)

hereinafter referred to collectively as "website".

#### 1. Basics

- (1) You can print out or save this document by way of the usual browser functions (generally "File"  $\rightarrow$  "Save as"). You can also download this document in PDF format and archive it by clicking  $\rightarrow$  here. In order to open the PDF file, you need the free Adobe Reader program (from www.adobe.de) or a similar program designed to generate PDF format.
- (2) Further information about the processing of personal data by Aluminium Rheinfelden, over and above that which occurs on the website, is available in the supplementary  $\rightarrow$  <u>Data Privacy Information pursuant to the GDPR for Customers and Suppliers</u>, which is also available on our website.
- (3) Unless otherwise specified below, the legal basis for handling your personal data arises from the need to process the data in order to provide the services requested by you on this website (Art. 6(1) (b) General Data Protection Regulation).

#### 2. Controller / Data Protection Officer

(1) The Controller pursuant to Art. 4 No. 7 EU General Data Protection Regulation (GDPR) is

Aluminium Rheinfelden Alloys GmbH Bukheinstrasse 2, DE 79618 Rheinfelden

hereinafter referred to as "Aluminium Rheinfelden", "we" or "us". Further information about the provider is available in the Legal Notice on our website.

(2) You can reach the external Data Protection Officer as follows: by email to <a href="mailto:s.baum@bhk-datenschutz.de">s.baum@bhk-datenschutz.de</a> or at our postal address by adding "to the attention Data Protection Officer".

#### 3. Provision of Website and Log Files

- (1) Where our website is used purely for information purposes, i.e. if you do not register or otherwise transfer information to us, we only collect the personal data that your browser sends to us. If you wish to view our website, we collect the following data which is necessary for technical reasons in order to display our website to you and ensure its stability and security (the legal basis for this is Art. 6 (1), sentence 1 (f) GDPR):
  - IP address
  - Date and time of request
  - Time zone difference to Greenwich Mean Time (GMT)
  - Content of the request (specific page)



- Access status/http status code
- · Amount of data transferred in each case
- · Website from which the request originates
- Browser
- Operating system and its interface
- Language and browser software version
- (2) User IP addresses are deleted or anonymised after use. In the case of anonymisation, IP addresses are changed in such a way that the individual details about personal or factual circumstances can no longer be assigned to a specific or identifiable natural person, or only with a disproportionately large expenditure of time, cost and manpower.

### 4. Cookies

- (1) In addition to the aforementioned log-file data, cookies are stored on your computer when you use our website. Cookies are small text files that are assigned to and stored on your hard disk by your browser and which send certain information to the operator that sets the cookie (in this case, us). Cookies cannot execute programs or transmit viruses to your computer. They help to make our website more user-friendly and efficient.
- (2) Use of cookies:
- a) This website uses the following types of cookie whose scope and function is described below:
  - Session cookies (see b)
  - Persistent cookies (see c).
- b) Session cookies are automatically deleted when you close your browser. They store what is known as a session-ID enabling various requests from your browser to be assigned to the session. This enables us to identify your computer the next time you visit our website. Session cookies are deleted when you log out or close the browser.
- c) Persistent cookies are automatically deleted after a specific time which may differ depending on the cookie. You can delete cookies in the security settings of your browser at any time.
- (3) Why do we set cookies?
- a) Settings and function

When you visit our website, the country and language, that is either detected automatically or selected by you, is saved in cookies so that you do not have to re-enter them on subsequent visits. Before this, we check whether your browser supports cookies and this information is stored in another cookie. Local contact information based on the country and language will then be displayed, and will also be saved. Legal basis for this is Art. 6 (1), sentence 1 (b) GDPR.

#### b) Analytics

We use the web analysis service Piwik in order to ensure the continuous improvement of our internet site for our customers and potential customers. By using these cookies, we obtain information from Google about the use of our internet site. For example, we find out how often and in what order the individual pages are accessed and on average how much time visitors spend on our site. We find out whether users have already visited our website previously. Legal basis for this is Art. 6 (1), sentence 1 (f) GDPR.

- → See Section 7 Web Analysis Services
- (4) Controlling cookies

You can configure your browser settings to suit your own preferences and e.g. manage or refuse acceptance of third-party cookies or any cookies as desired. You can delete existing cookies by way of



your browser settings. We would point out, that doing this may prevent you from using all the functions of this website.

#### 5. Email Contact

- (1) On its website, Aluminium Rheinfelden provides the contact details of the relevant people to contact. Legal basis for processing data transmitted in the course of sending a contact request by email is Art. 6 (1) (f) GDPR. Where the purpose of the email contact is to conclude a contract, the additional legal basis for processing it is Art. 6 (1) (b) GDPR. Where the contact request aims to initiate an employment contract, the legal basis is Section 26 German Data Protection Act (BDSG).
- (2) Data is deleted as soon as it is no longer necessary for achieving the purpose for which it was collected. As regards personal data from the input mask on the contact form and that which was sent by email, this is the case when the relevant conversation with the user is finished. The conversation is finished when the circumstances indicate that the matter has been conclusively dealt with.

#### 6. Online Job Application

- (1) Job vacancies are advertised on our website under the heading "Career". The person to contact for information about the relevant job is indicated, together with their contact details. In order to deal with your online job application, we collect, process and use your personal data. Your online application data is transmitted by email directly to the HR department and will of course be treated confidentially. Appropriate technical and organisational measures ensure that your personal data is handled confidentially in accordance with the statutory provisions.
- (2) When completing your online application, please take note that the data is transmitted by email in unencrypted form and that unauthorised persons may be able to access or falsify the data under certain circumstances. You may of course send us your documents by post. If you are applying for a specific position which has already been filled, or if we consider you to be equally or better suited to another position, we will be happy to forward your application to another department within our company. Please inform us if you do not agree to this procedure. At the end of the application process, but after no more than 6 months, your personal data will be deleted automatically unless you give your express consent to a longer storage period.

### 7. Web Analysis Services

### **Piwik**

- (1) This website uses the web analysis service Piwik in order to analyse the use of our website and ensure its regular improvement. The statistics obtained enable us to improve our content and make it more interesting for you as a user. Legal basis for using Piwik is Art. 6 (1), sentence 1 (f) GDPR.
- (2) For the purpose of this analysis, cookies (for more details on this see Section 3 herein) are stored on your computer. The information collected is stored by the controller exclusively on its server in Germany. You can stop the analysis by deleting any existing cookies and preventing the storage of cookies. If you prevent the storage of cookies, we would point out that this may also prevent you from using this website to its full extent. You can prevent the storage of cookies by way of the settings on your browser.

This website uses Piwik with the extension "AnonymizeIP". This means that IP addresses will be processed in a shortened form thereby preventing any direct identification of the user. The address transmitted from your browser by way of Piwik will not be combined with other data collected by us.

(4) The Piwik program is an open-source project. Information from third-party providers regarding data privacy is available at <a href="http://piwik.org/privacy/policy">http://piwik.org/privacy/policy</a>.



#### 8. Automated Decision Making

In principle, we do not use fully automated decision-making pursuant to Article 22 DSGVO to establish and carry out the business relationship.

#### 9. Profiling

In order to provide you with targeted information and advise you about products, in certain circumstances, we and/or our commissioned service providers use web analysis tools, particularly tracking technology. These facilitate appropriate communication and advertising. In this regard, we refer to Section 6 Web Analysis Services.

### 10. Your Rights

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights against us as the controller:

## a) Rights under Art. 15 et seq. GDPR

(1) You have the right to **information** pursuant to Article 15 GDPR. Under certain circumstances, you have the right to **rectification** under Article 16 GDPR, the **right to restriction of processing** under Article 18 GDPR and the **right to erasure** ("right to be forgotten") pursuant to Article 17 GDPR. In addition, you have the right to receive the data which you have provided in a structured, machine-readable format (**right to data portability**) pursuant to Article 20 GDPR, insofar as the processing is carried out by automated means and based on consent under Art. 6 (1) (a) or Art. 9 (2) (a) or on a contract under Art. 6 (1) (b) GDPR. In the case of the right to information and the right to erasure, the restrictions under Sections 34 and 35 German Data Protection Act (BDSG) apply.

#### b) Withdrawal of consent pursuant to Art. 7 para. 3 GDPR

You can notify us at any time to revoke your consent to the processing of personal data. This also applies to the revocation of consent given to us before the EU General Data Protection Regulation came into effect, i.e. prior to 25 May 2018. Please note that revocation only applies to the future. Processing carried out before revocation remains unaffected.

#### c) Right of Complaint

You have the right to lodge a complaint with us or with a data protection supervisory authority, notably in the Member State of your habitual residence, of your place of work or of the alleged infringement (Article 77 GDPR in conjunction with Section 19 BDSG). Section 9 remains unaffected.

### d) Right to Object

In addition to the foregoing rights, you have the right to object under Article 21 GDPR as follows:

# (1) Right to object based on your particular situation

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data concerning you which is based on point Article 6(1) (e) GDPR (Data processing in the public interest), or on Article 6 (1) (f) GDPR (Data processing for the purposes of the legitimate interests); this also applies to profiling based on those provisions within the meaning of Article 4 (4) GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or processing serves the establishment, exercise or defence of legal claims.



## (2) Right to object to the processing of data for marketing purposes

In certain cases, we process your personal data in order to carry out direct marketing. You have the right to object at any time to the processing of personal data concerning you, for the purpose of such marketing; this also applies to profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, we will cease to process your personal data for such purposes.

Objection can be made informally to the address indicated under Section 1 of this Data Privacy Statement

### 11. Security

- (1) We have taken technical and organisational security measures to protect your personal data from loss, destruction, manipulation and unauthorised access. All our employees and all third parties involved in data processing are bound by the obligation to comply with the requirements of the GDPR and by a duty of confidentiality when handling personal data.
- (2) In the case of the collection and processing of personal data via contact forms, the information is transmitted in encrypted form in order to prevent misuse of the data by third parties. Our security measures are continuously updated in line with technological progress.

### 12. Changes to our data privacy provisions

We reserve the right to change our security and data privacy measures insofar as technical progress makes this necessary. In this case, we will also adapt our Data Privacy Statement accordingly. Please therefore ensure that you are acquainted with the latest version of our Data Privacy Statement.