

Data protection information for customers, suppliers, and contractual partners

The protection and security of your personal data is very important to us. When storing and processing personal data, we undertake to comply with the principles of lawful data processing. In accordance with the provisions of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of your personal data and your rights in this regard.

1. Data controller

The data controller within the meaning of Art. 4 (7) GDPR and other relevant data protection provisions is:

hpw Metallwerk GmbH

Auwiesenstraße 2

A – 4030 Linz

Tel: +43 (0)732 30 72 70

E-Mail: info@hpwires.com

If you have any questions about the processing of your data, please contact dp@hpwires.com.

2. Categories of personal data

We only process personal data that is necessary for the establishment, execution and termination of a contractual relationship, as well as for pre-contractual measures. The data comes either directly from you or from publicly accessible sources (e.g. company website, commercial register, media). This includes in particular:

- Identity data of the contact persons (e.g. name, title, salutation, date of birth if applicable)
- Contact details (e.g. address, telephone number, email address)
- Information on professional function (e.g. position in the company)
- Legitimation data (e.g. ID data, if required by law)

3. Processing purposes and legal basis

In order to properly execute our contractual relationship, we process your personal data for the purposes described below and on the respective legal basis:

a. Fulfilment of pre-contractual, contractual and legal obligations (Art. 6 (1) lit. b and c GDPR)

Your personal data is processed for the purpose of implementing pre-contractual measures and fulfilling our contractual obligations, such as:

- Communication in the context of initiating business and executing contracts
- Accounting and contract management
- Transfer of data to courts, authorities, or legal representatives for the enforcement or defense of legal claims.

In particular, it may be necessary to pass on personal data to our contractual partners for the logistical processing and coordination of deliveries.

We also process data to fulfil legal obligations, in particular those arising from corporate, tax and fiscal law (e.g. retention obligations). In this context, personal data is also passed on to service providers (e.g. auditors).

b. Protection of legitimate interests (Art. 6 (1) lit. f GDPR)

Personal data may also be processed to protect our legitimate interests or those of third parties, for example for:

- Internal administrative purposes
- Processing general inquiries
- Organizing and inviting guests to events
- Ensuring IT and building security (e.g. visitor management, access controls, video surveillance on company premises)

Personal data is collected as part of visitor management, and video recordings may be made to secure the company premises. No audio recordings are made.

Processing only takes place if there are no overriding interests of the data subject that require protection. You have the right to object to processing for reasons arising from your particular situation.

c. Processing based on your consent (Art. 6 (1) lit. a und Art. 9 (2) lit. a GDPR)

If you voluntarily provide us with personal data and give your express consent, we will process this data in particular for the production and publication of photo and video recordings (e.g. at company events). Publication on our company website or in other media will only take place with prior written consent. You can revoke your consent at any time with effect for the future; the legality of the processing carried out up to that point remains unaffected.

4. Recipients of personal data

Within our company, only those departments and employees who need your personal data to fulfil a contract, comply with legal obligations, or protect legitimate interests will have access to it.

Data will only be passed on to third parties if this is legally permissible or necessary for the fulfilment of a contract. Recipients may include:

- Processors within the meaning of Art. 28 GDPR (e.g. IT and software service providers)
- Affiliated companies
- Authorities, courts, and public bodies (e.g. tax authorities)
- External consultants (e.g. lawyers, tax advisors)
- Insurance companies (e.g. liability insurance) and payment service providers (e.g. banks)
- Other contractual partners, insofar as this is necessary for the fulfilment of the contract

Data will only be transferred to third countries outside the EEA if there is a legal basis for doing so or if you have given your express consent. In such cases, we ensure an adequate level of data protection in accordance with Art. 44 ff. GDPR.

As a forward-looking company, we use cloud solutions for our internal and external communication, for video conferencing, for maintaining information and data security, and for customer care. The services we use are provided by Microsoft Corp (<https://www.microsoft.com/en-us/privacy/privacystatement>).

As part of our media relations work, your photo may be published on press channels (website, social media). This will only happen with your express consent.

5. Storage period

We only store your personal data for as long as is necessary to fulfil the purposes or as required by law. The storage period depends in particular on:

- the duration of the business relationship (including initiation and processing)
- statutory retention periods
- civil law or contractual limitation periods
- ongoing or foreseeable legal proceedings

Video recordings from surveillance are stored for a maximum of 72 hours, unless longer storage is necessary to investigate an incident.

6. Your rights in relation to personal data

You have the following rights under the GDPR:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object to processing (Art. 21 GDPR)
- Right to withdraw consent at any time with effect for the future (Art. 7 Abs. 3 GDPR)

7. Contact person

We are happy to answer any questions you may have about data protection. You can contact us to exercise the rights mentioned in this privacy policy or to submit a complaint. Please contact: dp@hpwires.com.

In addition, you have the right to lodge a complaint with the competent data protection supervisory authority if you believe that the processing of your personal data violates applicable data protection law.

You can reach us with your inquiries at the following contact details:

hpw Metallwerk GmbH

Auwiesenstraße 2

A – 4030 Linz

Tel: +43 (0)732 30 72 70, E-Mail: dp@hpwires.com

Linz, November 2025