



## Information according to Article 13 / 14 EU General Data Protection Regulation (GDPR) for Partners, Visitors and Interested Persons

*This privacy notice explains how and for what purposes Covestro AG and/or its affiliates (see contact below), in their capacity as respective data controllers (hereinafter “Covestro”, “we”, “us”), process your personal data. For communication purposes, the provision of information and services as well as for purposes connected with an existing business relationship, personal data is needed, e.g., name, contact data or the function of a data subject.*

*Employees may find our internal data privacy notice [here](#).*

*We receive your personal data through several channels, for example*

- *through the use of our online services,*
- *in the context of a registration process or an individual provision of data, e.g., by handing over a business card,*
- *by yourself or your company, e.g., when providing contact details.*

*This is done in compliance with both legal requirements and the personal rights of the persons concerned.*

### 1. Data Scope

The following data categories may be collected and processed:

- a. **Identification data**, e.g., name, gender, date and place of birth (visitors), national identification number (truck drivers), images (badges), CCTV (visiting monitored areas), User ID (using Covestro applications)
- b. **Addresses and contact data**, e.g., postal addresses, e-mail addresses, phone numbers, organizational data such as company/organization, department, function
- c. **Authorizations and their use**, e.g., IP addresses or user accounts for Wi-Fi (Guest-Net), online services or used business applications
- d. **Time and attendance**, e.g., being on Covestro premises or for providing services
- e. **Activities, tasks and operations**, e.g., for projects
- f. **Payment-relevant data**, e.g., bank account, credit card
- g. **Communication and usage data**, e.g., your email address, log-in information, log files, log data (e.g., IP address, timestamp, browser information), metadata (e.g., author name, editing/participation time), audio and video data during online conferences, e.g., when using communication and collaboration applications from Microsoft (Microsoft 365 environment, Teams, Forms, et al.) or from Slido.

## 2. Cookies

In the course of using our communication and collaboration applications, as well as in other areas when separately informed accordingly, cookies may be placed on your computer for the purposes of web analytics or to maintain user preferences. Cookies are small text files that are stored in the local memory of your web browser on your terminal device.

We use technically necessary cookies, for example, to ensure a secure connection or to recognize you during a session when you navigate within an application. It is always possible to decline cookies by changing the browser settings. Placed cookies can be deleted at any time. We only use other cookies, e.g., for analysis or marketing purposes, when we previously inform you and only with your consent.

## 3. Purposes

In general, your personal data may be used for:

- **Operational purposes**
- **Identification and authorization**
- **Communication**, e.g., for the clarification of questions, the exchange of information or for the coordination of appointments, for example by using Microsoft Teams as part of Microsoft Office 365
- **Documentation of activities**, e.g., meetings, events and agreements
- **Internal and external news coverage**, e.g., on trade fairs and events
- **Complaint management and litigation**

Additionally, in the case of requested services, visits or a closer relationship (neighborhood, media representatives), your personal data may be used for:

- **Provision of information and requested services**, e.g. newsletters
- **Monitoring and safety checks**

Related to Covestro business partners, e.g., suppliers, customers, contractors, service providers or chemical park partners, personal data may additionally be used for:

- **Settlement of transactions**, e.g., payment, invoicing and contract management
- **Logistics**, e.g., transportation
- **Authorization and identity management for electronic services**, e.g., including technical support and troubleshooting
- **Administrative communication**, e.g., sales promotion or product development
- **Monitoring, checks and surveys**, e.g., by using Tools as Microsoft Forms or Slido
- **Direct Marketing**

#### 4. Processing Principles

Reasonable technical and organizational measures for data security are implemented through internal regulations and - if the data is processed by an external service provider - by means of appropriate contractual agreements. If your data is also processed in countries outside the European Union (EU) or the European Economic Area (EEA), in which a lower level of data protection than in Europe could exist, this will only take place if the general requirements for the data transfer to third countries according to Art. 44 ff. GDPR are met or with your prior consent.

Please keep your data up to date, e.g., by informing us about relevant changes or, if possible, by changing the information yourself.

Please find information regarding your data subject rights in the section "Rights" below.

#### 5. Data Transfer / Disclosure

In compliance with legal requirements and existing internal regulations, the data required for the respective purpose may be disclosed to other internal and external recipients in the following cases:

##### **Operational Purposes**

- to other Covestro companies;
- to the purchaser or the acquiring company in the case of spinoffs or sales of parts of our company
- to our service providers

for example when using Microsoft Office 365 applications, Microsoft Ireland Operations Limited, One Microsoft Place, South county BusinessPark, Leopardstown, Dublin 18, D18P521, Ireland (Microsoft): Microsoft acts primarily as our processor within the meaning of Art. 28 GDPR with agreed processing in data centers in the European Union. Microsoft reserves the right to process customer data for its own legitimate business purposes in limited circumstances and then acts as an independent controller.

##### **Reporting and information obligations**

- to authorities and other governmental bodies

##### **Clarification of claims and accusations**

- to lawyers, courts and other governmental/statutory bodies

#### 6. Data Storage

Personal data will only be kept for as long as necessary to meet the respective purpose and to fulfill regulatory requirements, as a rule for the duration of the respective contractual relationship, including a possible statutory retention period.

For business partners related to a contract, the deletion usually takes place 10 years after the last contact, for other persons, e.g. interested persons or subscribers of newsletters, three years after the last contact or on request.

## 7. Monitoring and Investigation

For the protection of our IT systems and our intellectual property against different threats – e.g. malicious software, hacker attacks, spam, espionage and theft – different methods are used, in which, for example, exchanged data is examined for viruses and connection data is analyzed for abnormalities. For suspicious cases relevant documents and connection data can be analyzed.

In order to comply with existing export and payment restrictions – e.g., companies and persons are listed in different government lists – business partner data may be checked against these lists.

In addition, in the case of suspected violations, which have been reported for example via the compliance hotline, in the case of official investigations and defense against claims, an investigation and, where appropriate, provisioning of data and documents relating to the respective case and the persons concerned may be necessary.

In all cases internal regulations, legal requirements and the personal rights of the data subjects are respected.

## 8. Legal bases

Insofar as we obtain your consent to the processing of your personal data, Art. 6 (1) lit. a GDPR serves as the legal basis. For the processing of personal data that is necessary for the performance of a contract with you, Art. 6 (1) (b) GDPR serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures. Insofar as the processing of personal data is necessary for compliance with a legal obligation to which Covestro is subject, Art. 6 (1) lit. c GDPR is the legal basis. If the processing is necessary to protect a legitimate interest of our company or a third party and your interests, fundamental rights and freedoms do not override the former interest, Art. 6 (1) lit. f GDPR serves as the legal basis for the processing. The legitimate interest of Covestro is in particular the performance, safeguarding and improvement of its business activities. This legal basis is regularly relevant if your company is interacting with us and we process your personal data in this context as described here.

## 9. Rights

You have the right to:

- receive information about your personal data stored by us;
- request the rectification or erasure of your personal data or restriction of the processing;
- object to processing which serves our legitimate interest, a public interest or profiling, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims;
- data portability to the extent regulated by law, such as in Art. 20 GDPR;
- complain - if available - to a supervisory authority in your state, e.g., the “Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen” P.O. Box 20 04 44 40102 Düsseldorf, Germany; and
- **to withdraw your consent to the collection, processing and use of your personal data, e.g., for direct marketing purposes, at any time with future effect.**

To do so, please contact the Group Privacy Officer (see contact below)

## **10. Contact of the Controller, Group Data Privacy Officer**

The Covestro legal entity you are in contact with, e.g., due to a contractual relationship or events you have attended, is responsible for the data processing as controller.

If you have any questions or suggestions related to data privacy, please contact either the respective Covestro legal entity, the Covestro AG, Kaiser-Wilhelm-Allee 60, 51373, Germany, Phone: +49 214 6009 2000 or contact the Covestro AG Group Data Privacy Officer, Kaiser-Wilhelm-Allee 60, 51373 Leverkusen, Germany, E-mail: [data.privacy@covestro.com](mailto:data.privacy@covestro.com), Phone: +49 214 6009 2000

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