



kloeckner metals

Your partner for a sustainable tomorrow

Privacy Policy for Customers and Prospective Customers

June 2026

Contents

1	Who is responsible for the data processing? How can you contact the Data Protection Officer of Kloeckner Metals Austria?	3
2	What data do we process, for how long, and on what legal basis?	3
2.1	General business activities	3
2.1.1	Personal data and categories of data concerned.....	3
2.1.2	Purposes and legal bases	4
2.2	Digital presence.....	6
2.2.1	website visit	6
a)	Personal data and categories of data concerned	6
b)	Purposes and legal bases.....	6
2.2.2	user (login) area.....	7
a)	Personal data and categories of data concerned	7
b)	Purposes and legal bases.....	7
	Registration, login and access.....	7
	Order overview.....	7
	Contract portal.....	8
	Shopping cart (online shop)	8
2.3	Communication with customers and prospective customers.....	8
2.3.1	Personal data and categories of data concerned.....	8
2.3.2	Purposes and legal bases	8
	Newsletter with consent	8
	Communication with existing customers.....	9
	Transactional and system emails	9
3	How long is your data stored?.....	10
4	Is your data processed securely?	10
5	What happens if you do not provide your data or refuse to cooperate?	10
6	Is your data used for automated individual decision-making, including profiling?	11
7	Who can access your personal data and from where?.....	11



8	Data protection rights: What rights do you have?	11
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We are pleased that you are interested in our group of companies and our products.

With the following privacy notice, Kloeckner Metals Austria GmbH & Co KG (hereinafter also referred to as "Kloeckner," "we," or "us") provides you with information about the processing of your personal data in the context of our general business activities and, in particular, for the purpose of providing our services.

Personal data means any information relating to an identified or identifiable natural person (such as your first and last name, your address, your telephone number, or your email address).

Below, we would like to inform you in particular about which personal data is processed, for which purposes this is done in each case, and which rights you are entitled to in this respect.

1 Who is responsible for the data processing? How can you contact the Data Protection Officer of Kloeckner Metals Austria?

Controller responsible for data processing	Data Protection Officer
Kloeckner Metals Austria GmbH & Co KG Percostraße 12 A-1220 Wien Phone: +43 (0)1 259 46 36 0 Fax: +43 (0)1 259 46 36 39 Email: wien@kloeckner.com	Group Data Protection Officer of Kloeckner Metals Austria GmbH & Co KG Peter-Müller-Straße 24 D-40468 Düsseldorf Email: dataprivacy@kloeckner.com

2 What data do we process, for how long, and on what legal basis?

2.1 General business activities

2.1.1 Personal data and categories of data concerned

As part of our general business activities, we process various personal data relating to you. This may include information collected directly from you, for example when you are in a (pre-)contractual relationship with us or use our contact form, or information collected indirectly, for example from public registers or credit



agencies. The personal data includes in particular title, first name, last name, business email address, company name, business address, legal form of the company, billing address, delivery addresses and delivery details, payment method, (truncated) credit card information, business telephone number, tax number, Kloeckner customer number, details of customer-specific prices (agreed discounts and conditions), contracts and orders placed (including, for example, order number, call-off quantity unit, item number, requested unit of measure and timing), correspondence, delivery notes including address data and signature, and visit reports and contact reports as well as further communication history.

2.1.2 Purposes and legal bases

Purposes of processing	Description	Legal basis
General business activities	We process the above-mentioned data as part of our general business activities and, in particular, for the performance of our (pre-)contractual obligations. The performance of our (pre-)contractual obligations includes responses to expressions of interest in offers, products, or services, preparing and submitting offers, order processing including logistics and signature upon receipt of goods, payment processing and invoicing, as well as general customer and prospective customer support, for example in responding to questions about products. We also use your contact details to maintain and initiate the business relationship (e.g., contacting you regarding requests for quotations, customer satisfaction, customer retention, and post-purchase support).	The processing of contact information for contact persons is based on pursuant to Art. 6(1)(f) GDPR (for data of contact persons of contractual partners or prospective customers) or for the performance of our (pre-)contractual obligations pursuant to Art. 6(1)(b) GDPR (for natural persons). Our legitimate interests are to communicate with our contractual partners and prospective customers, to support you as a (potential) customer, and to improve the customer relationship or establish one. For more information about your rights, such as your right to object, please see Section 0.
Credit agencies and trade credit insurers	We collect and process data on the creditworthiness of the person/company in question or, where necessary, of prospective customers, including other information relevant to creditworthiness, such as information on	The legal basis for the processing is Art. 6(1)(f) GDPR. Our legitimate interest is to identify and reduce credit default risks.



	shareholding structures, overdue receivables, or enforcement information. Based on this information, a decision is made as to whether the customer or prospective customer will be offered purchase on advance payment or on account. Payment experience data is entered into an external payment information exchange system. Participants from various industries take part in this system and may access this information as an aggregated score.	
Liquidity management	For refinancing purposes, we regularly sell trade receivables to a special purpose vehicle as part of an asset-backed securitization ("ABS") program. The refinancing of the special purpose vehicle is carried out through credit instruments for which the trade receivables serve as collateral. As part of the ABS program, your personal data may, where necessary, be transferred to external recipients (Kloeckner special purpose vehicle, service providers, as well as banks and their special purpose vehicles).	The legal basis is our legitimate interest pursuant to Art. 6(1)(f) GDPR, which consists in liquidity management.
Sanctions list screening	Kloeckner is obliged to comply with the applicable (international and national) sanctions and anti-terrorism regulations. Sanctions lists are centrally maintained registers of persons, associations, or companies against whom governmental economic or legal restrictions have been imposed. To fulfill these compliance requirements, we carry out checks using personal data where necessary. This serves the decision on initiating and/or continuing a business relationship and the avoidance of violations of economic and legal restrictions.	The legal basis is compliance with legal obligations pursuant to Art. 6(1)(c) GDPR in conjunction with European anti-terrorism regulations 2580/2001 and 881/2002, as well as international legislation.
Analysis of purchasing and customer/prospective customer behavior	We process your personal data to analyze general customer and prospective customer behavior. The purpose of the processing is to understand individual differences between customers or prospective customers, for example with regard to (expected) order frequency, ordering channel, quantities, prices, etc., to respond to you individually.	The basis for this is our legitimate interest pursuant to Art. 6(1)(f) GDPR, which consists in promoting sales through targeted offers and customer support.



Further development of systems	In some cases, we also use existing order and contract or prospective customer communications to further develop our digital systems, for example to automatically read and respond to inquiries by means of an algorithm. For this type of development (artificial intelligence, machine learning), a large number of known data sets is generally required to "train" the system, for example using past requests for quotations.	The legal basis for this is our legitimate interest pursuant to Art. 6(1)(f) GDPR, which consists in system optimization for the purpose of improved customer support.
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2.2 Digital presence

2.2.1 website visit

a) Personal data and categories of data concerned

Each time our online shop is accessed, we process the following data:

- the connection data of the requesting computer, including the IP address,
- the Accept-Language header for setting the language of the online shop,
- the web pages accessed, including the page from which you accessed our website,
- the date and time of your visit,
- browser information,
- the size of the data volume transmitted in connection with the connection.

In addition, third-party content is integrated, which means that, for technical reasons, the IP address is transmitted to the respective third-party provider to send the content to your browser. Device-specific information (e.g., browser type, operating system) and, where applicable, usage data (e.g., click behavior, dwell time) are also processed by the third-party provider.

b) Purposes and legal bases

We process your personal data for the provision of our websites and to ensure technical operation, to defend against attempted attacks, and for the purpose of identifying and remedying malfunctions based on Art. 6(1)(b) GDPR as well as Art. 6(1)(f) GDPR. In doing so, we pursue the interest of enabling the secure and functional use of the website. No evaluation for marketing purposes takes place.



2.2.2 user (login) area

a) Personal data and categories of data concerned

In our online shop, in addition to the personal data listed under section 2.1.1, we process the user data of the users assigned to your account, including name (user administration), customer number, business email address and password (encrypted), the identifier of your account, as well as usage data generated in connection with the use of the online shop, such as event registration data or details regarding the shopping cart or favorites.

In addition, information on contracts and orders is processed (e.g., order or contract number, order or contract date, order or contract type, status of call-offs or contracts, term, quantity, responsible contact person, unit of measure, delivery address, item number, expected delivery date, status).

b) Purposes and legal bases

The following information explains the additional purposes beyond those listed in section 2.1.2:

Purposes of processing	Description	Legal basis
Registration, login and access	In our online shop, we offer you the opportunity to create a password-protected customer account in order to make inquiries, view offers, manage contracts, and administer personal data. To ensure the protection of your account, comprehensive technical measures for access control as well as the precise management of technical access rights are implemented in order to prevent unauthorized access by third parties to your data.	The legal basis for creating an account, using the access-protected area, and technical safeguarding is Art. 6(1)(b) GDPR (for data of contractual partners) or Art. 6(1)(f) GDPR (for data of contact persons of contractual partners). Our legitimate interests lie in initiating and performing contracts and in providing an appropriately technically secured area.
Order overview	The order overview includes status tracking. It also enables the triggering of new orders based on standard requirements.	We process this data for the handling and provision of the order overview on the basis of Art. 6(1)(b) GDPR (for data of contractual partners) or Art. 6(1)(f) GDPR (for data of contact persons of contractual partners).



Contract portal	The contract portal is used to manage framework agreements, the allocation of items to framework agreements or called-off contingents, and the prices and delivery terms agreed in the respective framework agreements. It enables you at any time to inspect, for example, the status of call-offs or document versions.	We process this data for the handling and provision of the contract portal on the basis of Art. 6(1)(b) GDPR (for data of contractual partners) or Art. 6(1)(f) GDPR (for data of contact persons of contractual partners).
Shopping cart (online shop)	If you fill a shopping cart and abandon the ordering process by closing the browser window or temporarily saving the shopping cart without placing the order, we process your shopping cart data as well as your telephone number or your email address for the purpose of direct marketing.	The processing is carried out on the basis of Art. 6(1)(f) GDPR in order to draw attention to the items remaining in the shopping cart or to ask about any technical reasons for abandoning the order.

2.3 Communication with customers and prospective customers

2.3.1 Personal data and categories of data concerned

In addition to the personal data listed under section 2.1.1, the following data is processed: position, address, industry classification, and customer or prospective customer class; department within the company; time of initial contact; contact person number assigned to me; my language; purchasing behavior and purchasing history (online/offline); customer creation date; information on my customer advisors and the sales organization; contact points; and services activated for me and used by me, as well as my communication behavior in connection with marketing measures. For prospective customers and customers with consent, an analysis of opened emails and click behavior is performed.

2.3.2 Purposes and legal bases

Purposes of processing	Description	Legal basis
Newsletter with consent	If you have given us your consent, we send newsletters by email based on the double opt-in procedure. After registering via our forms, you will receive a confirmation link at the email address provided. You will only receive the newsletters after clicking the confirmation link. To target emails effectively, we analyze the personal data we hold, including your	If you have given us your consent, the processing is carried out based on Art. 6(1)(a) GDPR. You may withdraw your consent at any time with effect for the future (e.g., via



	purchasing and customer behavior, according to defined criteria and assign you to suitable customer groups for the respective newsletter. On this basis, content can be personalized and delivered according to defined selection criteria, such as relevant product information. In this way, you receive information that is as relevant as possible, and we can tailor our approach to your needs with minimal wastage. The content may include discount campaigns, customer satisfaction surveys, and invitations to events and trade fairs. We use an analytics tool to perform reach analysis. For this purpose, a pixel, i.e., a digital point, is integrated into the email, which reports back to us whether an email has been opened. We use this information to evaluate the relevance of our marketing campaigns.	the unsubscribe link or settings in the preference center). For further information on your rights, please refer to section 8.
Communication with existing customers	Within the framework of existing business relationships, we inform existing customers about suitable products, in particular offers that are similar to or related to their previous purchases. For this purpose, we analyze the personal data we hold, including your purchasing and customer behavior, according to defined criteria and assign you to suitable customer groups. On this basis, content can be personalized and delivered according to defined selection criteria, such as relevant product information. In this way, you receive information that is as relevant as possible, and we can tailor our approach to your needs with minimal wastage. The measures may include discount campaigns, customer satisfaction surveys, and invitations to events and trade fairs.	Communication with existing customers is performed based Art. 6(1)(f) GDPR. Our legitimate interest consists in legally required communication or, in individual cases, in promoting sales.
Transactional and system emails	These emails are sent regularly in order to properly process your inquiries and orders (e.g., for the purpose of sending confirmations of receipt and order confirmations, invoices, delivery updates, or payment reminders), shopping cart notifications, notifications regarding the security and administration of your user account (e.g., password dispatch), or	We process this data for the sending of transactional and system emails on the basis of Art. 6(1)(b) GDPR (for data of contractual partners or prospective customers) or Art. 6(1)(f) GDPR (for data of contact persons of contractual partners or



	technical maintenance messages regarding the availability of our services.	prospective customers). Our legitimate interest consists in sending you contractually required communication and offering you our customer service.
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3 How long is your data stored?

We store your data only for as long as is necessary for the purposes pursued by the processing (generally the performance of contracts and order handling, including any warranty obligations as well as the processing of inquiries) or for as long as retention obligations exist in this regard. In particular, tax and commercial law requirements are relevant, which generally require retention for 6 to 10 years.

If you withdraw your consent to the processing of personal data, we will delete your stored personal data unless another legal basis entitles us to continue processing. This includes, in particular, the existence of legal obligations, such as statutory retention periods.

4 Is your data processed securely?

We have implemented technical and organizational measures, considering the state of the art, to adequately safeguard our processing activities involving customer and prospective customer data. These include measures for identity and access management, for the defense against unauthorized access to forms and websites, as well as security mechanisms for detecting and defending against automated attacks (e.g., token-based verification) and the use of encryption.

5 What happens if you do not provide your data or refuse to cooperate?

Unless otherwise indicated, the provision of personal data is required for the respective processing purpose, such as the business relationship, the use of our websites, and personalized direct marketing. In the case of required data, failure to provide it means that the relevant service, such as the contract portal or order overview, cannot be provided. Otherwise, failure to provide data may mean that we cannot provide our services in the same form and quality.



6 Is your data used for automated individual decision-making, including profiling?

Automated individual decision-making, including profiling within the meaning of Article 22 GDPR, does not take place in connection with the use of our service.

7 Who can access your personal data and from where?

Within the group companies of Kloeckner, only those people may view your personal data to the extent necessary who require such access to fulfill the above-mentioned purposes. Outside the group companies, your personal data may only be viewed if this is necessary for the handling or processing of your inquiries and orders, if there is an explicit legal permission, for example in connection with corporate transactions, or if we have your consent for this purpose.

Your personal data may be viewed, for example, by processors in the areas of technical infrastructure and maintenance or the provision of contract-relevant content, authorities and public institutions such as public prosecutors, courts, or tax authorities to which we must transfer personal data for legally mandatory reasons, or by other recipients such as payment service providers, credit agencies, banks, debt collection companies, or special purpose vehicles and service providers (ABS).

We generally transfer personal data to recipients within the European Union or the European Economic Area if this is necessary for the performance of our contractual obligations, for the implementation of pre-contractual measures, due to a legal obligation, or based on a legitimate interest or consent. Where applicable, data may be viewed outside the territory of the European Union / the European Economic Area. This is only possible if the respective country ensures a level of data protection comparable to the European standard, for example through adequacy decisions or appropriate safeguards such as standard contractual clauses with effective protective measures.

8 Data protection rights: What rights do you have?

As a data subject, you have the following rights, provided that their respective requirements are met:



Access: You may request information as to whether and which personal data concerning you is being processed.

Rectification: You may request the correction of inaccurate data concerning you. In addition, you may request the completion of incomplete data.

Erasure: In certain cases, you may request the deletion of your personal data, provided that no contrary retention periods or other reasons prevent this.

Restriction of processing: In certain cases, you may request that we restrict the processing of your data.

Data portability: You may request that the data processed by you be provided to you in a structured, commonly used, and machine-readable format or that we transmit it to another controller.

Withdrawal of consent: If you have given us consent to process your data, you may withdraw this consent at any time with effect for the future. This does not affect the lawfulness of the processing of your data until the withdrawal.

Right to object

Right to object on grounds relating to your particular situation: If we process your personal data on the basis of our legitimate interests pursuant to Art. 6(1)(f) GDPR, you have the right to object at any time, either in general or with respect to specific purposes of processing, on grounds relating to your particular situation, to the processing of your personal data.

We will then no longer process this personal data for these purposes unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing serves the establishment, exercise, or defense of legal claims.

Right to lodge a complaint with the supervisory authority: You have the right to lodge a complaint with a data protection supervisory authority, in particular in the Member State of your habitual residence, your place of work, or the place of the alleged infringement, if you consider that the processing of personal data concerning you is unlawful. The competent supervisory authority is the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna.

Exercising your rights: To exercise your rights or if you have any questions about data protection, please use the contact details provided above in section 1, "Who is responsible for data processing? How can you contact the Data Protection Officer of Kloeckner Metals Austria?". Please ensure that we are able to clearly identify you.

Supplementary provisions



We reserve the right to amend this privacy notice so that it always complies with current legal requirements or to implement changes to our services in the privacy notice.

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Ansprechpartner

Group Data Protection Office

Kloeckner Metals Austria GmbH & Co KG

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