

General Data Protection Notice

Dear Employees,

In this digital age, data is collected and processed. At voestalpine, the following principle applies for the voestalpine Mitarbeiterbeteiligung Privatstiftung: A high degree of data protection and data security must be ensured wherever personal data is stored and processed.

In the course of the administration of the voestalpine Group's employee participation plan, it is essential that the voestalpine Mitarbeiterbeteiligung Privatstiftung, voestalpine-Straße 1, 4020 Linz, (hereinafter "Privatstiftung") process your personal data. "Personal data" is any information that relates to an identified or identifiable natural person (e.g. names and addresses).

Please find attached a summary of participants' personal data that the Privatstiftung processes:

1. Categories of personal data processed, purpose of the processing and legal basis

As part of the administration of the voestalpine Group's employee participation plan, the Privatstiftung processes the following categories of personal data:

- » Data required for addressing (name; title; address; gender)
- » Data required for unambiguous identification (SI number; date of birth; unique ID)
- » Employment relationship data (employer company; country code; department abbreviation; hourly-wage/salaried employee/manager; personnel number; leaving information)
- » Other data necessary for processing the share allocation (reporting data on inclusion in the employee participation plan; account details; deposit number (if available); employee participation plan contributions, shares from employee participation plans, performance bonuses, reassessment; price information; acquired shares; dividend payment; use of tax allowances; proceeds from the sale of shares; tax on price gains; severance payment entitlement; vacation compensation months)

The legal basis for data processing is Article 6 (1) (b) of the General Data Protection Regulation (GDPR): (processing is necessary for the performance of a contract to which the data subject is party or for pre-contractual measures;)

The processing of personal data is necessary to meet the aforementioned purposes. If the aforementioned personal data is not made available at all or not made available to the required extent, or if the private foundation cannot collect this data, participation may not be possible.

2. Transfer and disclosure of personal data

Personal data is transferred to credit institutions for contract fulfillment in compliance with data protection regulations. Without your consent, we will not transfer your personal data to third parties unless it is required to perform our duties or is required by law/authorities.

The private foundation commissions contractors (service providers) with the processing of personal data (e.g.: IT service providers). These processors are contractually bound to comply with the applicable data protection regulations.

The recipients described in paragraph 2 of personal data may be located in countries outside of the European Union ("third countries"), in which applicable laws do not offer the same level of data protection as the laws of the respective individual's home country. In this case, according to the legal requirements personal data is only transferred if the European Commission has adopted an adequacy decision for the third country, if adequate safeguards have been agreed (e.g. EU Standard Contractual Clauses were concluded), the recipient participates in an approved certification system (e.g. EU-US Privacy Shield), binding corporate rules are implemented in accordance with Art. 47 of the General Data Protection Regulation or there is a derogation for specific situations in accordance with Art. 49 of the General Data Protection Regulation (e.g. because you explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards). Further information and a copy of the implemented measures can be obtained from the contact listed under 5.

3. Retention periods

Your personal data will be erased respectively anonymized if the retention of the personal data is no longer necessary to fulfill the purposes for which they were collected and if no statutory retention obligations (e.g. commercial and tax retention obligations) require us to further retain the data

4. Right of access to and rectification or erasure of personal data, restriction of processing; right to object to processing, right to data portability and right to withdraw explicitly granted consent

- » In accordance with Art. 15 GDPR, you have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed and access to information about this data.
- » In accordance with Art. 16 GDPR, you have the right to obtain without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed.
- » . In accordance with Art. 17 GDPR, you have the right to erasure of your personal data.
- » In accordance with Art. 18 GDPR, you have the right to restrict processing.
- » In accordance with Art. 20 GDPR, you have the right to data portability.
- » In accordance with Art. 21 GDPR, you have the right to object to the processing of personal data.
- » Finally, you are entitled to file a complaint with a supervisory authority.
- » If processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In order for us to efficiently respond to such a request, we ask you to contact us using the contact data listed below and to provide us with confirmation of your identity, for example, by sending us an electronic copy of your ID

5. Contact

For any questions related to data protection and asserting your rights listed above, please contact mitarbeiterbeteiligung@voestalpine.com

This general data protection policy for participants in the employee participation plan will be revised from time to time. The date of the last revision is in the footer.