

PRIVACY NOTICE FOR OUR (PROSPECTIVE) BUSINESS PARTNERS, THEIR REPRESENTATIVES AND CONTACT PERSONS

Dear Partner!

CLAAS HUNGÁRIA Mezőgazdasági Gépgyártó Korlátolt Felelősségű Társaság (registered seat: 5200 Törökszentmiklós, Kombájn utca 1.; company registration number: 01-16-004318; "CLAAS" or "we") **and you as a (prospective) natural person contracting partner or your company have a business or contractual relationship with each other.** In order to establish/maintain a business relationship with CLAAS as well as to enter into and perform a contract, we will need to process your personal data **as (prospective) natural person contracting partner** or we will process the **personal data of persons representing your company** and of **persons you have provided as contact persons.**

Dear Representative and Contact Person!

Please note that you have been designated as a representative/contact person in the business relationship between your employer or the company you represent and CLAAS or in connection the contract to be concluded/concluded therewith. By providing your data (e.g. name, company e-mail address, telephone number), you or your employer/company you represent provide or provided CLAAS with personal data.

CLAAS is obliged to notify **you, as a (prospective) natural person contracting partner or a natural person designated as the representative or contact person in connection with the business relationship or contract,** of the data processing in accordance with the Articles 13 and 14 of the General Data Protection Regulation Nr. 2016/679 of the European Parliament and of the Council (hereinafter the "**Data Protection Regulation**").

Definitions used in this Notice are applied with the same content as specified in Article 4 of the Data Protection Regulation.

1. Name and contact details of the controller

CLAAS, as your (prospective) business or contractual partner, or the (prospective) business or contractual partner of your employer or the company you represent, processes your personal data. Contact details of CLAAS are as follows:

name: **CLAAS HUNGÁRIA Mezőgazdasági Gépgyártó Korlátolt Felelősségű Társaság**

seat: 5200 Törökszentmiklós, Kombájn utca 1.

company reg. number: 01-16-004318

phone number: 0036-56-597-600

HR-156 Adatkezelési Tájékoztató Üzleti partnerek részére V 1.0

Kiadás dátuma: 2024.08.07.



email address: hr-clh@claas.com

2. Name and contact details of the Data Protection Officer

A Group Data Protection Officer was appointed at CLAAS Group.

Name of the group data protection officer:

CLAAS KGaA mbH

Konzerndatenschutzbeauftragter (Vállalatcsoport adatvédelmi tisztviselője)

cím: Mühlenwinkel 1, 33428 Harsenwinkel, Németország

e-mail: datenschutz@claas.com vagy privacy@claas.com

3. Categories and sources of personal data

CLAAS may process categories of personal data as follows:

- **Master data:** *name, address, tax number, company registration number of the (prospective) business/contractual partner*
- **Contact details:** *Your first name, surname, job title, company contact details (address, e-mail address, phone number) as a (prospective) natural person contracting partner or a natural person designated as the representative or contact person in connection with the business relationship or contract*
- **Bank account data:** *account holder, bank, IBAN, BIC/SWIFT code*
- **Communication data:** *the content of our business/contractual partner's business communication with us, the circumstances of the business communication with our business/contractual partner (in particular the names of the parties involved, date/time and duration)*
- **Contract data:** *information received from business/contract partners or third parties prior to the conclusion of the contract in order to take various steps and/or to perform contracts with our business partners, data of written contract documents received from business/contract partners, data of written contract documents prepared by us*
- **Invoice data:** *data of invoices and payment notifications received from contractual partners, in particular invoice items and amount of the invoices*
- **Payment data:** *data relating to payment transactions, in particular the date and amount of the payment*
- **Minutes data:** *data derived from minutes of meetings and discussions with business/contractual partners regarding the business content thereof, which we prepare in order to maintain the business relationship*

- **Analytical data:** data from analyses of our business partners' business structures, which we prepare to strategically coordinate our business relationships

The above personal data is essentially provided to us by you, your employer or the company you represent. Certain personal data may also be generated by CLAAS. In addition, we may receive information to be considered as personal data from third parties prior to entering into a contract in order to take various steps and/or to perform the contracts concluded.

CLAAS provides information on the data processing related to access control and the operation of the camera system at its registered seat in the "**Security Camera Surveillance and Access Control Policy**", which is available at the reception desk at its registered seat.

4. Purpose and legal basis for processing

The CLAAS processes the personal data defined in Clause 3 above for the following purposes and legal basis:

Data processing activity and purpose of data processing	The categories of processed personal data	Legal basis and legitimate interests (if applicable)
4.1 Preparation of contracting Taking various steps prior to the conclusion of the contract, including provision of information, pre-contract correspondence, preparation of offers and cost estimates	Master data, Contact details, Communication data, Contract data.	Where the data subject is a (prospective) contracting partner, the legal basis is taking of steps at the request of the data subject prior to entering into a contract (Article 6 para. (1) lit. (b) of the Data Protection Regulation). Where the data subject is a representative or contact person of a business/contractual partner, the legal basis is the legitimate interest of the controller (Article 6 para.(1) lit.(f) of the Data Protection Regulation). Our legitimate interest is taking steps at the request of our (potential) business/contractual partners prior to the conclusion of the contract.
4.2 Performance of contracts Performance of contracts concluded with our business partner, including invoicing and managing payments, checking confirmations of completion issued by business partners, facilitating the issuance of confirmation of completion by business partners,	Master data, Contact details, Bank account data, Communication data, Contract data, Invoice data, Payment data.	Where the data subject is a (prospective) contractual partner, the legal basis is the performance of a contract to which the data subject is a party (Article 6 para.(1) lit.(b) of the Data Protection Regulation). Where the data subject is a representative or contact person of a business/contractual partner, the legal basis is the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is to perform the contract with our business/contractual partners, to facilitate the contractual performance of the business partners, to monitor the performance of the contract.

complaints, providing feedback to our business partner		
<p>4.3 Bookkeeping</p> <p>Proper bookkeeping and retention of documents in order to comply with legal requirements (including in particular with obligations under the Accounting Act and tax legislation)</p>	<p>Master data, Contact details, Bank account data, Communication data, Contract data, Invoice data, Payment data.</p>	<p>The legal basis is compliance with the legal obligation applicable to the controller (Article 6 para. (1) lit. (c) of the Data Protection Regulation), in particular the requirements of Article 169 para.(1) of Act Nr. C of 2000 on Accounting ("Accounting Act") and Act Nr. CL of 2017 on the Rules of Taxation.</p> <p>Where the data subject is a (prospective) contractual partner, the legal basis is also the performance of a contract to which the data subject is a party (Article 6 para. (1) lit. (b) of the Data Protection Regulation).</p> <p>Where the data subject is a representative or contact person of a business/contractual partner, the legal basis is furthermore the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is the performance of a contract concluded with business/contractual partners and compliance with legal provisions related to the fulfilment of the contract.</p>
<p>4.4 Retention of documents</p> <p>Retention of documents for evidentiary purposes in order to submit, assert or defend potential legal claims</p> <p>Submitting, asserting or defending legal claims, including consultation with external legal advisers</p>	<p>Master data, Contact details, Bank account data, Communication data, Contract data, Minutes data, Invoice data, Payment data.</p>	<p>The legal basis is the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is to submit, assert or defend legal claims.</p>
<p>4.5 Consultation with external tax advisers and/or auditors</p> <p>Consultation with external tax advisers and/or auditors in order to comply with legal obligations.</p>	<p>Master data, Contact details, Bank account data, Communication data, Contract data, Invoice data, Payment data.</p>	<p>The legal basis is the compliance with the legal obligation on the data controller (Article 6 para. (1) lit. (c) of the Data Protection Regulation), according to Article 155 para. (2) of the Accounting Act.</p>
<p>4.6 Cooperation with courts and/or authorities</p>	<p>Master data, Contact details, Bank account data,</p>	<p>The legal basis is compliance with the legal obligation on the data controller (Article 6 para. (1) lit. (c) of the Data Protection Regulation).</p>

Cooperation with courts and/or authorities to comply with obligations prescribed by law.	Communication data, Contract data, Invoice data, Payment data.	
4.7 Managing business relationships Managing business relationships, including contacting (potential) business partners in order to notify them and maintain contact with (potential) business partners.	Master data, Contact details, Communication data, Contract data, Minutes data.	The legal basis of the management of business relationships is, as a general rule, the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is to maintain and strategically coordinate our relationships with our business/contractual partners. The legal basis for contacting our business/contractual partners for the purpose of notifying them may be consent (Article 6 para. (1) lit. (a) of the Data Protection Regulation) or the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation), depending on the circumstances of each case, in particular the method of contact. Our legitimate interest is to inform our business/contracting partners on opportunities to establish further business relationships.
4.8 Operation of CLAAS 's IT system Operation of IT systems (including e-mail accounts and applications), storage of data, backup of data and archiving of data for the purpose of ensuring IT security, protection of business secret and internal compliance	Master data, Contact details, Bank account data, Communication data, Contract data, Invoice data, Payment data Minutes data, Analytical data.	The legal basis is the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is to maintain and protect communication channels (especially e-mail accounts) and business secrets.
4.9 Compliance Ensuring compliance with legislation and internal policies	Master data, Contact details, Bank account data, Communication data, Contract data, Invoice data, Payment data Minutes data, Analytical data.	The legal basis is the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is to achieve internal compliance.

5. Persons entitled to have access to personal data

The table below presents, who has access within CLAAS or within the CLAAS group to personal data indicated in Clause 4 of this Notification, as well as and to which external recipients the data will be transferred. Data processors have access to the data processed on behalf of CLAAS until the termination of the data processing agreement with CLAAS.

Data to which access is ensured	Persons with access rights within CLAAS	Recipients within the CLAAS Data processing activity/purpose of the data transfer	External recipients Data processing activity/purpose of the data transfer
Data required for the various steps to be taken before the conclusion of the contract (see Clause 4.1. above)	<p>a) Purchasing Department, Facilities Management Department, Supply Chain Management Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader)</p> <p>b) person concluding the contract in the name of CLAAS or the person indicated as contact person for the purposes of the contract</p>	<p>Central purchasing, purchasing departments of other companies belonging to the CLAAS group (companies belonging to the CLAAS group and their contact data can be reached at https://www.claas.com/en-gb/about-claas/locations);</p> <p><i>controller</i></p> <p><i>Purpose of the data transfer:</i> assessing the solvency of the business partner</p>	<p>Regarding the Master data and Contact details: suppliers/courier services</p> <p><i>controllers</i></p> <p><i>Purpose of the data transfer:</i> delivery of consignment</p>
Data required for the performance of contracts concluded with our partner, including invoicing and managing payments,	a) Purchasing Department, Facilities Management Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management,	Central purchasing, purchasing departments of other companies belonging to the CLAAS group (companies belonging to the CLAAS group	Regarding the Master data and Contact details: suppliers/courier services <i>controllers</i>

<p>checking the confirmations of completion issued by business partners, facilitating the issuance of confirmations of completion by business partners, complaints, providing feedback to our business partner (see Clause 4.2. above)</p>	<p>IT Department, Production (Unit leader), Supply Chain Management</p> <p>b) person concluding the contract in the name of CLAAS or the person indicated as contact person for the purposes of the contract</p> <p>c) person authorised to approve the invoice</p>	<p>and their contact data can be reached at https://www.claas.com/en-gb/about-claas/locations;</p> <p><i>controller</i></p> <p><i>Purpose of the data transfer:</i> approval of the invoice</p>	<p><i>Purpose of the data transfer:</i> delivery of consignment</p>
<p>Data required for the proper bookkeeping and retention of documents in order to comply with legal requirements (see Clause 4.3. above)</p>	<p>Purchasing Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader), Supply Chain Management</p>	<p>CLAAS KGaA mbH (33428 Harsewinkel Mühlenwinkel 1., Germany);</p> <p><i>controller</i></p> <p><i>Purpose of the data transfer:</i> conducting compliance audits within the CLAAS group</p>	<p>Iron Mountain Magyarország Kft. (1093 Budapest, Czuczor u. 10) archiving service provider, processor</p> <p><i>Data processing activity:</i> archiving documents</p>
<p>Data related to retention of documents for evidentiary purposes</p> <p>Data required for submission, assertion and defence of legal claims (see Clause 4.4. above)</p>	<p>Purchasing Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader), Supply Chain Management</p>	<p>Group data protection officer (see Clause 2 above), <i>controller</i></p> <p><i>Purpose of the data transfer:</i> ensuring compliance with data law</p>	<p>a) Nádasy Law Office, as leading law office of the WTS Legal Association, as well as member lawyers and law offices of the WTS Legal Association, as external legal service providers</p> <p><i>joint controllers</i></p> <p><i>Purpose of the data transfer:</i> providing legal services</p> <p>b) courts and authorities</p> <p><i>controllers</i></p> <p><i>Purpose of the data transfer:</i> exercise of official authority</p>

Data required for consultation with external tax advisers and/or auditors in order to comply with legal obligations (see Clause 4.5. above)	Purchasing Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader), Supply Chain Management	Group data protection officer (see Clause 2 above) <i>controller</i> <i>Purpose of the data transfer: ensuring compliance with data law</i>	WTS KLIENT ADÓTANÁCSADÓ KFT. (1143 BUDAPEST, Stefánia út 101), external tax advisor, auditor <i>controllers</i> <i>Purpose of the data transfer: providing tax advices and auditing services</i>
Data required for cooperation with courts and/or authorities to comply with obligations prescribed by law (see Clause 4.6. above)	Purchasing Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader), Supply Chain Management	Group data protection officer (see Clause 2 above) <i>controller</i> <i>Purpose of the data transfer: ensuring compliance with data law</i>	a) courts and authorities <i>controllers</i> <i>Purpose of the data transfer: exercise of official authority</i> Nádasdy Law Office, as leading law office of the WTS Legal Association, as well as member lawyers and law offices of the WTS Legal Association, as external legal service providers <i>joint controllers</i> <i>Purpose of the data transfer: providing legal services</i>
Data required for management of the business relationships, including contacting (potential) business partners in order to inform them and maintain contact with (potential) business partners (see Clause 4.7. above)	Purchasing Department, Tax & Accounting Department, Controlling, Compliance, Manufacturing Engineering, R&D, HR Department, Quality Management, IT Department, Production (Unit leader), Supply Chain Management	Central purchasing, purchasing departments of other companies belonging to the CLAAS group (companies belonging to the CLAAS group and their contact data can be reached at https://www.claas.com/en-gb/about-claas/locations)	-

		<i>controller</i> <i>Purpose of the data transfer:</i> management of business relationships within the group	
Data processed for the purpose of secure operation of IT system of CLAAS, protection of trade secrets and internal compliance (see Clause 4.8. above)	IT, with temporary access	CLAAS KGaA mbH (33428 Harsewinkel Mühlenwinkel 1., Germany); <i>controller</i> <i>Purpose of the data transfer:</i> implementation of the CLAAS group's global IT security, providing back-up support	Microsoft Ireland Operations Limited (The Atrium Building Block B, Carmanhall Road Sandyford Business Estate Dublin 18) <i>processor</i> <i>Data processing activity:</i> ensuring Microsoft 365
Data processed for the purpose of ensuring compliance with legislation and internal policies (Clause 4.9.)	Controlling, Compliance	Group data protection officer (see Clause 2 above) <i>controller</i> <i>Purpose of the data transfer:</i> ensuring compliance with data law	Nádasdy Law Office, as leading law office of the WTS Legal Association, as well as member lawyers and law offices of the WTS Legal Association, as external legal service providers <i>joint controllers</i> <i>Purpose of the data transfer:</i> providing legal services

In addition, the data specified in this Notice may be transferred to investors and their advisors in the event of a company law transaction or sale of a company related to CLAAS for the purpose of preparing the company law transaction or performing due diligence. The legal basis is the legitimate interest of the controller (Article 6 para. (1) lit. (f) of the Data Protection Regulation). Our legitimate interest is the proper preparation and execution of the relevant company law transaction or sale.

6. Data transfer to a third country

The primary place of processing of your data is Hungary and Germany (where our main operational centres are located). In the case data is transferred outside the EU or EEA to a country, for which the European Commission has not adopted an adequacy decision (including if we intend to transfer your personal data to a company within the CLAAS group which is located outside the European Union and the European Economic Area), CLAAS implements appropriate safeguards and compliance measures to ensure that your personal data is adequately protected and your rights are respected, such as binding corporate rules (BCRs) or EU standard contractual clauses and, where necessary, appropriate supplementary measures. Companies belonging to the CLAAS group and their contact details are listed on <https://www.claas.com/en-gb/about-claas/locations>.

7. Automated decision-making, including profiling

No decision based solely on automated processing will be made in relation to the data processing activity.

8. Retention period of the processed data

The personal data specified in this Notice – in consideration of the provisions of Section 169 para. (1) of the Accounting Act – will, as a general rule, be stored for a maximum of 8 years commencing at the end of the year in which the business/contractual relationship with the business partner terminates, unless a dispute arises. In the event of a legal dispute, the data will be stored for 10 working days commencing at the date of the final resolution of the dispute or the expiry of the limitation period (5 years).

Analytical data will be stored for 3 years commencing at the end of the year in which the business/contractual relationship with the business partner terminates.

9. Obligation to provide personal data and consequences of failure to provide such data

The provision of the personal data specified in this Notice is not prescribed by law. However, the provision of Master data, Contact Details and Bank Account data is a requirement of entering into a contract with our business partner. If you are acting as a contact person or representative of our business/contractual partner, the obligation to provide Contact details may be arisen from your employment or other contractual obligations.

If the Master data, Contact details and Bank account data are missing, it may not be possible to conclude or perform the contract.

10. Your rights as a data subject

- You may request from CLAAS

- a) **access to your personal data** (Article 15 of the Data Protection Regulation). In this regard, you are entitled to obtain information as to whether or not your personal data are being processed, and access the personal data (including obtaining copies) and information relevant from a data protection perspective (e.g. categories of recipients, duration of storage, safeguards relating to international data transfers, etc.).
 - b) **rectification** of your personal data (Article 16 of the Data Protection Regulation). In this regard, you are entitled to request rectification of incorrect data or the completion of incomplete data.
 - c) **erasure** of your personal data (Article 17 of the Data Protection Regulation) or
 - d) **restriction of processing** (Article 18 of the Data Protection Regulation).
- You may **object** against processing based on legitimate interest of CLAAS (the charts in Clauses 3. and 4. indicate the exact data covered by this notification). Unless we have compelling legitimate grounds for processing and your employer provides us with another contact person, we will no longer process your personal data.
 - **Consent** can be withdrawn at any time: in some cases, the legal basis for processing is your consent (see Clause 4.7 of this Notice). You are entitled to withdraw your consent at any time, without prejudice to the lawfulness of the processing up to the point of withdrawal.
 - Request for enforcement of abovementioned rights may be lodged to CLAAS on the contact specified in Section 1 above. CLAAS shall fulfil the application as soon as possible but within a maximum of 25 days and notifies you about the measures carried out or the reasons of refusal of the application.
 - **Right to lodge complaints:** You have the right to lodge complaints with the Hungarian National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11.; website: www.naih.hu; email: ugyfelszolgalat@naih.hu; phone: + (36)-1-391-1400). Before lodging a complaint with the authority, you are recommended to submit such complaint to CLAAS to enable us to investigate your request first.
 - **Judicial remedy:** In the event of an infringement of the data subject's rights, you are entitled to seek judicial remedy against CLAAS Ruling in the matter falls under the jurisdiction of the regional court. Actions may be brought, at the data subject's option, before the competent regional court where the data subject is living or residing.