

Data Privacy Policy for business partners and visitors of MTU Aero Engines AG, MTU Maintenance Hannover GmbH, MTU Maintenance Berlin-Brandenburg GmbH and MTU Aero Engines Polska Sp. z o. o.
(hereinafter each referred to individually as “MTU”)

MTU takes the protection of its business partners’ and visitors’ personal data very seriously. We process personal data in accordance with the applicable statutory provisions on data protection and data security.

§ 1 Controller and scope of application

The controller in the sense of the General Data Protection Regulation and other national data protection laws of Member States as well as other privacy law provisions is:

- For orders from/to MTU Aero Engines AG:

MTU Aero Engines AG
Dachauer Strasse 665
D-80995 Munich
- For orders from/to MTU Maintenance Hannover GmbH:

MTU Maintenance Hannover GmbH
Münchner Str. 31
D-30855 Langenhagen
- For orders from/to MTU Maintenance Berlin-Brandenburg GmbH:

MTU Maintenance Berlin-Brandenburg GmbH
Dr.-Ernst-Zimmermann-Str. 2
D-14974 Ludwigsfelde
- For orders from/to MTU Aero Engines Polska Sp. z o. o.:

MTU Aero Engines Polska Sp. z o. o.
Tajecina 108
36-002 Jasionka
Poland

§ 2 Data protection officer

The data protection officers of the relevant controllers are:

Helga Schorr MTU Aero Engines AG Dachauer Strasse 665 D-80995 Munich Email: MTU.DSB@mtu.de	Jens Ramming MTU Maintenance Hannover GmbH Münchner Str. 31 D-30855 Langenhagen Email: MTU-H.DSB@mtu.de	Mario Niemeyer MTU Maintenance Berlin-Brandenburg GmbH Dr.-Ernst-Zimmermann-Str. 2 D-14974 Ludwigsfelde Email: LUD_Datenschutz@mtu.de	MTU Aero Engines Polska Sp. z o. o. Tajecina 108 36-002 Jasionka Poland Email: PLRZE-Privacy@mtupolska.com
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§ 3 What is personal data?

Personal data are individual details about personal or factual situations of a specific or identifiable natural person (data subject). This includes information such as your name, address, phone number, date of birth, or e-mail address.. Information which we cannot relate to your person (or can only do so at disproportionate expense), e.g. because the information has been anonymised, is not personal data.

§ 4 General information on data processing

a) Scope

We generally only collect and use our business partners' personal data where this is required for the preparation, execution and processing of a contractual relationship between our company and the business partner.

Your personal data will not be used for any other purpose, especially not for advertising purposes. We will not transmit your personal data to third parties without your consent, except in the cases outlined below, unless we are legally obliged to disclose the data.

If necessary, we will transmit personal data for the purposes listed under § 5 to companies affiliated with MTU Aero Engines AG in the sense of §§ 15 et seq. AktG (Stock Corporation Act).

If necessary we will also, where legally permitted, transmit personal data to courts, supervisory authorities (esp. aviation safety authorities) or legal advisers in order to comply with applicable law or to assert, exercise or defend against legal claims.

Where we transmit data to service providers (e.g. providers of IT services, cloud service providers) acting on behalf of our company, we will contractually oblige them in advance to comply with the applicable requirements of data protection law and they will be subject to our instructions.

Personal data may also be processed in a country outside the country where you, the entity on behalf of which you act or MTU is located, including third countries outside the European Union or the European Economic Area. When personal data is transferred to third parties in other jurisdictions, we will make sure to protect your personal data by applying the level of protection required under applicable data protection laws.

b) Legal basis

When processing personal data which is required to pursue a contractual relationship with your company, Art. 6 para. 1 b GDPR will serve as the legal basis. Where processing personal data is required for compliance with a legal obligation to which our company is subject, Art. 6 para. 1 c GDPR will serve as the legal basis.

If processing is required to protect a legitimate interest on the part of our company or a third party and the data subject's interests, basic rights and basic freedoms do not outweigh the above interest, Art. 6 para. 1 f GDPR will serve as the legal basis for the processing. Our legitimate interest in the processing lies in ensuring the efficiency and effectiveness of our company's activity and the effective execution of our contractual relationship. Physical protection and security of our sites are the legitimate interest for video surveillance. Information signs indicate surveilled areas.

If you have given your consent to the processing of personal data relating to you, this declaration of consent serves as the legal basis in accordance with Art. 6 para. 1 a GDPR. You can revoke this consent at any time.

c) Erasure of data and storage period

Your personal data will be erased or blocked as soon as the purpose of storage no longer applies. Data may, however, be stored beyond this if provided for by European or laws or other statutory provisions which the controller is subject to. Data will be blocked or deleted when a storage period prescribed by the above standards expires, unless it is necessary to continue storing the data for conclusion or fulfilment of a contract.

§ 5 Purpose of data processing

In the course of cooperation we process our business partners' personal data especially for the following purposes:

- Preparation, execution and processing of a contractual relationship, incl. associated communication.
- Preparation and execution of conferences, campaigns, negotiations, customer/supplier surveys, invitations to trade fairs or (virtual) events;

- Processing and responding to your requests;
- Invitation to (virtual) events;
- Participation in market research or surveys;
- Risk management and performance of audit procedures to prevent, detect, and react to, illegal, irregular or contractually non-compliant conducts
- Compliance with legal requirements (esp. those of aviation, tax, commercial or export control laws);
- Assertion of legal claims and their (judicial or extrajudicial) enforcement;
- Video surveillance for ensuring physical protection and security of our sites.

§ 6 Categories of personal data

The processing of the following categories of personal data is required for the above purposes:

- Personal master data such as surname, first name, business address, phone/fax number and business email address;
- Communication data as part of the business communications;
- Visitor data including data from access control and building monitoring;
- Payment details, i.e. details required for the processing of payment procedures;
- Data on the use of MTU IT systems (e.g. log files);
- Information collected from publicly available sources, databases or credit agencies (e.g. credit reform);
- Images recorded by means of video surveillance (indicated by information signs).

§ 7 Security measures to protect the data we store

We undertake to protect the personal data we store and to treat it as confidential. In order to avoid loss or misuse of the data we store, we take comprehensive technical and organisational measures, which are regularly checked and adapted to technological progress. We would like to point out, however, that due to the structure of the internet, it is possible that the data protection rules and the above-mentioned safety measures may not be observed by other persons or institutions outside our field of responsibility. In particular, data disclosed in unencrypted form - e.g. by email - may be read by third parties. We have no technical influence on this. It is the business partner's responsibility to protect the data it provides from misuse by encryption or otherwise.

§ 8 Data subjects' rights

If business partners' personal data is being processed, they have the following rights vis-à-vis the controller:

1. Right to information

You can request confirmation from the controller as to whether your personal data are being processed.

If this is the case, you can request details of the following:

- (1) the purposes for which the personal data are being processed;
- (2) the categories of personal data which are processed;
- (3) the recipients or categories of recipients to whom your personal data have been or will be disclosed;
- (4) the planned duration of storage of your personal data or, if specific information on this is not possible, the criteria for determining the storage period;

- (5) the existence of a right to rectification or erasure of your personal data , a right to restrict the processing by the controller or a right to object to such processing;
- (6) the existence of a right of appeal to a supervisory authority;
- (7) all available information on the origin of the data, if the personal data was not obtained from the data subject;

You have the right to request information on your personal data are transferred to a third country or to an international organisation. In this regard, you can request information on the appropriate safeguards in accordance with Art. 46 GDPR in connection with the transfer of the data.

2. Right to rectification

You have a right to rectification and/or completion in relation to the controller if your personal data being processed are incorrect or incomplete. The controller must carry out the without delay.

3. Right to restriction of processing

Under the following circumstances, you can request that the processing of your personal data shall be restricted:

- (1) if you are contesting the accuracy of your personal data ;
- (2) if the processing is unlawful and you reject the deletion of the personal data and instead demand that the use of the personal data be restricted;
- (3) if the personal data is no longer required for the purposes of the processing, but you require it in order to assert, exercise or defend against legal claims; or
- (4) if you have objected to the processing in accordance with Art. 21 para. 1 GDPR and it has not yet been determined whether the controller's legitimate interests outweigh your reasons.

If the processing of your personal data has been restricted, such data - except for storing it - may only be processed with your consent or for the purpose of asserting, exercising or defending against legal claims or protecting the rights of another natural or legal person or on the basis of an important public interest of the EU or a Member State.

If the processing has been restricted under the aforementioned conditions, you will be informed by the controller before the restriction is lifted.

4. Right to deletion

a) Deletion obligation

You can request the controller to delete your personal data without undue delay, and the controller is obliged to delete this data without undue delay, if:

- (1) Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.

- (2) You withdraw your consent, which was the basis for the processing according to Art. 6 para. 1 a or Art. 9 para. 2 a GDPR, and there is no other legal basis for the processing.
- (3) You file an objection against the processing according to Art. 21 para. 1 GDPR and there are no reasons for the processing which precede this objection, or you file an objection against the processing according to Art. 21 para. 2 GDPR.
- (4) Your personal data were processed unlawfully.
- (5) The deletion of the personal data concerning you is required for the fulfilment of a legal obligation according to EU law or the law of Member States to which the controller is subject.
- (6) The personal data concerning you was collected in relation to information society services offered in accordance with Art. 8 para. 1 GDPR.

b) Information to third parties

If the controller has disclosed your personal data to the public and is obliged to delete it according to Art. 17 para. 1 GDPR, it shall take appropriate measures, including technical ones, considering the available technology and implementation costs, to inform the processors of the personal data that you as a data subject have requested that they delete all links to such personal data or copies or replications thereof.

c) Exceptions

The right to deletion is excluded, if and to the extent the processing is required

- (1) to exercise the right of freedom of expression and information;
- (2) to fulfil a legal obligation which requires processing in accordance with EU law or that of Member States to which the controller is subject or to perform a task that is carried out in the public interest or in the exercise of official authority vested in the controller;
- (3) for reasons of public interest in the area of public health in accordance with Art. 9 para. 2 h and i as well as Art. 9 para. 3 GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89 para. 1 GDPR, if the right described under section a is likely to render the achievement of the objectives of this processing impossible or seriously impair it, or
- (5) to assert, exercise or defend legal claims.

5. Right to information

If you have asserted the right to rectification, erasure or restriction of processing, the controller is obliged to inform all recipients to whom your personal data was disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or would involve disproportionate expense.

You have the right to receive information on these recipients.

6. Right to data portability

You have the right to receive your personal data on which you have provided to the controller in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller, provided that

- (1) the processing is based on consent according to Art. 6 para. 1 a GDPR or Art. 9 para. 2 a GDPR or on a contract according to Art. 6 para. 1 b GDPR and
- (2) the processing is carried out by automated means.

In exercising this right, you also have the right to have your personal data transmitted directly from us to another controller, where this is technically feasible. The freedom and rights of other persons may not be adversely affected by this.

The right to data portability does not apply to the processing of personal data that is necessary to perform a task that is carried out in the public interest or in the exercise of official authority vested in the controller.

7. Right to withdraw declaration of consent under data protection law

You have the right to withdraw your declaration of consent under data protection law at any time. The withdrawal of consent will not affect the lawfulness of processing carried out based on the consent prior to withdrawal.

8. Right to object

You have the right to object at any time, on the grounds of your particular situation, to the processing of your personal data. We shall no longer process your personal data, unless we can prove protection-worthy compelling reasons for the processing, which outweigh your interests, rights and freedoms, or unless the processing is used to assert, exercise or defend legal claims.

9. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right of appeal to a supervisory authority, in particular in the Member State where you reside, work or where the alleged infringement has been made, if you believe that the processing of your personal data is contrary to the stipulations of the GDPR.