



Mandatory data protection information: ‘Know Your Customer’ process for natural persons (including beneficial owners) according to article 13 DSGVO

1. Processing Specific Information

Name and contact details of the person responsible	HM Trading Global GmbH, Berliner Straße 6, 69120 Heidelberg, Germany (below referred to as “HMT GmbH” or “Responsible”), Telephone: +49 6221-481-0 Fax: +49 6221-481-13217, E-Mail: info@hmt-global.com
Contact details of the data protection officer	HM Trading Global GmbH, Berliner Straße 6, 69120 Heidelberg, Germany Telephone: +49 6221-481-41110 E-Mail: info.dataprotection@hmt-global.com
Categories of personal data that are processed	<p>In accordance with the German law on the tracing of profits from serious criminal offenses - "Money Laundering Act" (hereinafter "GwG"), HMT GmbH has to comply with money laundering due diligence obligations. In order to implement these obligations, HMT GmbH identifies contractual partners or natural persons acting for them using the so-called Know Your Customer Shipping/Trading questionnaire (hereinafter "KYC questionnaire"); cf. §§ 10, 11 GWG. The following categories of personal data are collected from contractual partners of HMT GmbH:</p> <p>KYC-Questionnaire:</p> <ul style="list-style-type: none">• First and last names• Date and place of birth• Nationality• Residential address <p>HMT GmbH checks the correctness of the information collected in the KYC questionnaire using a valid official ID that fulfills the passport and ID requirements in Germany; cf. Section 12 (1) GWG.</p>
Purpose of processing personal data	According to the GWG, HMT GmbH has to implement a money laundering control procedure to prevent a business relationship from being related to money laundering and terrorist financing. For this purpose, HMT GmbH uses the KYC questionnaire to identify contractual partners who have reasonable suspicion that they are related to money laundering or terrorist financing. The purpose of data processing in the context of the KYC questionnaire is to implement the money laundering control procedure. In addition,

	<p>HMT GmbH has to determine whether the contractual partner or beneficial owner is a politically exposed person, a family member or a known close person; cf. §§ 10, 11 GWG.</p>
<p>Legal basis for processing of personal data for the above purpose</p>	<p>The legal basis for data processing is Article 6 Paragraph 1 Clause 1 Letter c) ("Fulfillment of a legal obligation") EU General Data Protection Regulation (hereinafter "GDPR").</p> <p>The person responsible processes personal data of his contractual partner only insofar as this is necessary on the basis of the GWG for the purpose of preventing money laundering and terrorist financing; cf. §§ 5, 10, 11a GWG. In the event of suspicion, the person responsible identifies contractual partners or persons acting on their behalf; see Section 10 Paragraph 3 No. 3 GWG.</p>
<p>Recipients or categories of recipients of personal data</p>	<ul style="list-style-type: none"> • HC Trading Services B.V. ("Istanbul Branch") HMT GmbH has assigned the identification of contractual partners via KYC questionnaire to HC Trading Services B.V. ("Istanbul Branch"); see Section 17 GWG. Istanbul Branch is the independent branch of HC Trading B.V. and processes personal data on behalf of HMT GmbH. Istanbul Branch is located in the third country (Türkiye). The transmission of personal data to Turkey takes place on the basis of the Heidelberg Materials group-internal data protection agreement, "HeidelbergCement Data Processing and Transfer Agreement". • Other recipients If necessary, external lawyers, authorities (e.g. Europol, Federal Office for the Protection of the Constitution, police, public prosecutor's office, court) or administrative bodies or supervisory authorities (e.g. competent regional council as supervisory authority, central office for financial transaction investigations and terrorist financing, responsible central reporting offices of other member states of the European Union, data protection authority) may be given access the personal data of the contractual partners.
<p>Necessity of data collection</p>	<p>The GWG obliges HMT GmbH to implement measures to prevent money laundering and terrorist financing. The provision of personal data is required to identify contractual partners via the KYC questionnaire. Without the provision of the data, HMT GmbH would violate the GWG.</p>
<p>Place of processing and transfer to third countries</p>	<p>Personal data collected in the KYC questionnaire is transmitted to Turkey (so-called third country) and stored there on Istanbul Branch servers.</p>

	<p>This data is protected from unauthorized access by a folder structure with restricted access and is managed in the network drive Shared Drive ("Google Drive"). A total of 20 employees from the finance department of HMT GmbH have access to data from the KYC questionnaire.</p> <p>In addition, personal data from the KYC questionnaire is processed in Germany, the country in which HMT GmbH is based.</p> <p>If necessary, the data must also be transmitted to (foreign) authorities, insofar as this is necessary for legal reasons.</p> <p>The above-mentioned recipients can therefore also be based in countries outside the European Economic Area ("third countries"). In third countries, the level of data protection may not be guaranteed to the same extent as in the European Economic Area. If data is transmitted to a third country, those responsible ensure that the data is only transmitted in accordance with the statutory provisions (Chapter V GDPR).</p>
<p>Duration for which the personal data will be stored</p>	<ul style="list-style-type: none"> • Regularly for a period of 3 years after the end of the year in which the data was collected. • 6 or 10 years, insofar as there are corresponding statutory (commercial or tax law) storage obligations, whereby the storage period for contracts only begins after the end of the contract. • In individual cases, the data is stored for a longer period of time if the person responsible has a legitimate interest in storing the data beyond the aforementioned periods (e.g. when defending against or pursuing legal claims).

2. Your rights as a data subject

As a data subject, you can contact our data protection officer at any time with an informal message using the above contact details in order to exercise your rights under the GDPR to:

- receive information about data processing and a copy of the processed data (right to information, Art. 15 GDPR),
- request the correction of incorrect data or the completion of incomplete data (right to correction, Art. 16 GDPR),
- request the deletion of personal data and, if the personal data has been published, information to other responsible parties about the request for deletion (right to erasure, Art. 17 GDPR),
- request the restriction of data processing (right to restriction of processing, Art. 18 GDPR),

- receive, if the conditions specified in Art. 20 GDPR are met, the personal data of the data subject in a structured, commonly used and machine-readable format and to request the transfer of this data to another controller (right to data portability, Art. 20 GDPR),
- object at any time to the processing of personal data relating to you, for reasons arising from your particular situation, based on Article 6 (1) sentence 1 lit. f) GDPR with effect for the future (right on objection, Art. 21 GDPR); The person responsible will then no longer process your personal data unless the person responsible can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims,
- revoke consent at any time in order to prevent data processing based on your consent. The revocation has no influence on the lawfulness of the processing based on the consent before the revocation (right of revocation, Art. 7, para. 3 GDPR),
- lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. Thereafter, without prejudice to any other administrative or judicial remedy, you can complain to a supervisory authority, in particular in the member state of your place of residence, your place of work or the place of the alleged infringement, if you believe that the processing of your personal data violates the GDPR.

The following data protection supervisory authority is responsible for the person responsible:
State Commissioner for Data Protection and Freedom of Information Baden-Württemberg
Lautenschlagerstraße 20, 70173 Stuttgart, poststelle@lfdi.bwl.de

Online complaint form:

<https://www.baden-wuerttemberg.datenschutz.de/online-beschwerde/>

You are also welcome to contact us first. As is well known, a lot can be clarified in a telephone call.

HM Trading Global GmbH