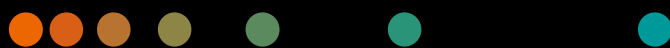


# Siemens Healthineers Business Partner Privacy Notice



Siemens Healthineers<sup>1</sup> is committed to protecting and respecting the privacy of the personal data of employees and contact persons of our customers, suppliers, vendors, and partners (“Business Partners” and “Business Partner Contacts”). This privacy notice explains how Siemens Healthineers processes personal data in compliance with the EU General Data Protection Regulation (GDPR).

## Purposes for processing personal data

While collaborating with Business Partners, Siemens Healthineers may process personal data of Business Partner Contacts for the following purposes:

- Communicating with Business Partners about products, services, and projects of Siemens Healthineers or Business Partners, e.g., by responding to inquiries or requests;
- Planning, performing, and managing the (contractual) relationship with Business Partners, e.g., to process orders for products and services, to collect payments, for accounting and billing purposes, and to perform deliveries, maintenance activities or repairs;
- Contacting Business Partners with information and offers on our products and services and conducting other marketing activities, such as performing customer surveys, marketing campaigns, market analyses, sweepstakes,

contests, or other promotional activities or events;

- Maintaining and protecting the security of our products, services, and websites, preventing, and detecting security threats, fraud, or other criminal or malicious activities;
- Ensuring compliance with legal obligations (such as record keeping obligations), Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), Siemens Healthineers policies and industry standards; and
- Solving disputes, enforcing our contractual agreements, and establishing, exercising, or defending legal claims.

## Categories of personal data processed

For the purposes above, Siemens Healthineers may process the following categories of personal data:

- Contact information, such as name, work address, work telephone number, and work email address;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
- Further information which is required for processing in the context of a project or

<sup>1</sup> Siemens Healthineers AG, Henkestr. 127, 91052 Erlangen, Germany and its affiliated companies within the meaning of Sec. 15 et. seq. German Stock

Corporation Act (Aktengesetz)

- contractual relationship with Siemens Healthineers or which is voluntarily provided;
- Information collected from publicly available sources, integrity data bases and credit agencies; and
- If required for Business Partner compliance screenings: information about relevant and significant litigation or other legal proceedings against Business Partners.

## Legal basis for the processing

The legal basis for Siemens Healthineers processing personal data is that such processing is necessary for the purposes of

- the performance or fulfillment of a contract with the Business Partner including the establishment of the business relationship (Article 6 (1) (b) GDPR);
- compliance with Siemens Healthineers' legal obligations (Article 6 (1) (c) GDPR);
- safeguarding Siemens Healthineers legitimate interests (Article 6 (1) (f) GDPR). Siemens Healthineers' legitimate interests lie in the processing of personal data for the purpose of initiating, implementing, and settling the business relationship. Where Siemens Healthineers relies on its legitimate interests for processing personal data, Siemens Healthineers has determined that, after a balancing of interests, its legitimate interests are not overridden by our Business Partners' interests and rights or freedoms. More information on the balancing of interests can be obtained by contacting the Siemens Healthineers Data Privacy Organization.

If, in individual cases, a Business Partner Contact has expressly given his/her consent to the processing of personal data, this consent is the legal basis for Siemens Healthineers processing this personal data (Article 6 (1) (a) GDPR).

## Recipients and transfer of personal data

Siemens Healthineers may share personal data with the following recipients, if and to the extent such transfer is necessary:

- Siemens Healthineers companies;
- other recipients such as Business Partners or (IT-) service providers which process personal data as part of their service provision for Siemens Healthineers (e.g., hosting or IT maintenance and support services);
- third parties in connection with complying with

legal obligations or establishing, exercising, or defending rights or claims or in relation to corporate transactions (e.g., for court and arbitration proceedings, to law enforcement authorities and regulators, to attorneys and consultants).

Sometimes a recipient to whom Siemens Healthineers transfers personal data is in a country in which applicable laws do not provide the same level of data protection as the GDPR. In such cases and unless permitted otherwise by applicable law, Siemens Healthineers only transfers personal data if appropriate and suitable safeguards for the protection of personal data are implemented, in particular, if the recipient entered into the [EU Standard Contractual Clauses](#) for the transfer of personal data to third countries with us or if the recipient has established approved [Binding Corporate Rules](#) in its organization.

Further information on the safeguards in place is available by contacting the Siemens Healthineers Data Privacy Organization.

## Storage duration

Unless indicated otherwise at the time of the collection of the Business Partner Contact's personal data (e.g., within a consent form completed by the Business Partner Contact), Siemens Healthineers deletes personal data if the retention of the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed and no legal obligations or the establishment, exercise or defense of legal claims make a longer retention necessary.

## Rights

The GDPR may entitle the Business Partner Contact to specific rights in relation to their personal data. In particular, and subject to the statutory requirements, Business Partner Contacts may be entitled to:

- obtain from Siemens Healthineers confirmation as to whether or not personal data concerning the Business Partner Contact is being processed, and where that is the case, gain access to the personal data;
- obtain from Siemens Healthineers the rectification of inaccurate personal data;
- obtain from Siemens Healthineers the erasure of Business Partner Contact's personal data;
- obtain from Siemens Healthineers restriction of processing regarding the Business Partner

- Contact's personal data;
- obtain from Siemens Healthineers a copy of personal data, which the Business Partner Contact actively provided, and request from Siemens Healthineers that it transmits this data to another recipient selected by the Business Partner Contact; and
- object, on grounds relating to the Business Partner Contact's particular situation, to the processing of personal data insofar as the processing of personal data is based on legitimate interests.

In case a Business Partner Contact declared his/her consent for the processing of personal data by Siemens Healthineers, the Business Partner Contact has the right to withdraw the consent at any time with future effect, i.e., the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal.

To receive more detailed information regarding these rights or to exercise any of these rights, please contact the Siemens Healthineers Data Privacy Organization.

## **Data Protection Officer, Siemens Healthineers Data Privacy Organization**

The Siemens Healthineers Data Protection Officer and the Siemens Healthineers Data Privacy Organization provide support with any data privacy related questions, comments, concerns, or complaints or in case a Business Partner Contact wishes to exercise any of its data privacy related rights. The Siemens Healthineers Data Protection Officer may be contacted at:

[dataprivacy.func@siemens-healthineers.com](mailto:dataprivacy.func@siemens-healthineers.com)

The Siemens Healthineers Data Privacy Organization will always use best efforts to address and settle any requests or complaints brought to its attention. In addition, you may also contact a supervisory authority with requests or complaints.

The competent lead supervisory authority for Siemens Healthineers is: Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Promenade 18, 91522 Ansbach, Germany, [lda.bayern.de/en/index/html](https://lda.bayern.de/en/index/html)

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