<u>Privacy policy of voestalpine</u> for the use of Microsoft Teams

As a technologically innovative company, <u>voestalpine AG</u> (hereinafter referred to as voestalpine) attaches particular importance to the protection of your personal data. For this reason, we would like to inform you about what personal data is collected, how it is used and what options you have in this regard. You can obtain further information, including information on data protection in general, at https://www.voestalpine.com/group/de/datenschutz/.

Who is responsible for your data?

voestalpine AG is responsible for processing **customer data**.

voestalpine AG (FN 66209 t) voestalpine-Straße 1 4020 Linz, Austria info@voestalpine.com

You can reach **voestalpine AG**'s Group Data Protection Manager at:

Group Data Protection Office
voestalpine AG
voestalpine-Straße 1
4020 Linz, Austria
group-dataprotection@voestalpine.com

What are the purposes and legal bases for the processing of data by Microsoft Teams?

<u>voestalpine</u> uses Microsoft Teams for internal and external communication to maintain its own operations and optimize business processes. The legal basis is Art. 6 para. 1 lit. f in conjunction with Art. 28 DSGVO. In principle, Microsoft processes all personal data on voestalpine's instructions.

What personal data does Microsoft Teams collect and process?

Customer data: Microsoft Teams collects all text, audio, video, image files, phone numbers, third-party applications, and software that you add or upload to Teams yourself. At a minimum, this includes first and last names, full display name, email address, and chat messages.



Employee data: Microsoft Teams collects all text, audio, video, image files, phone numbers, third-party applications, and software that you add or upload to Teams yourself. At a minimum, this includes first and last names, full display name, email address, and chat messages.

Data type	Affected category	Purpose	Storage duration
User account	External data	Identification and description of the customer account	90 days after deletion of Azure Active Directory account
Last Logon	External data	Storage in M365	90 days after deletion of Azure Active Directory account
First name	External data	Identification and description of the customer account	90 days after deletion of Azure Active Directory account
Last name	External data	Identification and description of the customer account	90 days after deletion of Azure Active Directory account
Full display name	External data	Identification and description of the customer account	90 days after deletion of Azure Active Directory account
SMTP mail address	External data	Unique sender and recipient address	90 days after deletion of Azure Active Directory account
Phone number	External data	Identification and description of the customer account	90 days after deletion of Azure Active Directory account
Chat messages	Texts in Teams Chat	Storage in M365	Private chats: 36 months; teams channel messages: 24 months after last team use
Entered content	Data shared with a team	Maintenance of business activity	24 months after last use of a team



Where is personal data stored by Microsoft Teams and is the data transferred to a third country?

<u>voestalpine</u> stores **customer data and employee data** in encrypted form exclusively on Microsoft Azure servers in the EU, of which the data centers are located in Germany and the Netherlands.

Pseudonymized **diagnostic data** and **data generated by the service** ("legitimate business activities") are transferred to a third country, primarily the USA. The transfer is based on EU standard contractual clauses and the EU-US Data Privacy Framework. In addition, to best protect your personal data, Microsoft has taken on additional contractual obligations. These commitments provide for:

- the data subject is entitled to compensation whose data have been unlawfully processed and who has suffered (im)material damage as a result;
- the data subject will be informed if Microsoft is legally required by a government order to release data to U.S. security authorities;
- Microsoft will take legal action and go to the U.S. courts to challenge the government order to hand over the data.

Microsoft is responsible for the processing of personal data collected for "legitimate business activities."

Microsoft Enterprise Service Privacy

Microsoft Corporation

One Microsoft Way

Redmond, Washington 98052, USA

You can reach Microsoft's Privacy Officer at:

Microsoft Ireland Operations, Ltd

Attn: Data Privacy One Microsoft Place

South County Business Park

Leopardstown

Dublin 18, D18 P521, Ireland



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Who gets access to my data?

<u>voestalpine</u> uses subcontractors to provide its own services, e.g. for support or maintenance. However, these subcontractors are contractually obligated to comply with EU data protection regulations, i.e. DSGVO. The legal basis for this is Art. 28 DSGVO.

Nearshore/Onshore/	Country	Company name	Company	Processor/	Commissioned by
Offshore			address	Subprocessor	
Onshore	Austria	voestalpine group-IT	voestalpine- Strasse 3, 4020	Processor	voestalpine AG
		GmbH	Linz, Austria		
Onshore	Ireland	Microsoft Ireland Operations, Ltd.	One Microsoft Place South County Business Park Leopardstown Dublin 18, D18	Processor	voestalpine AG
			P521, Ireland		

What rights do you have?

- a. request information on the categories of data processed, the purposes of processing, any recipients of the data, the planned storage period (Art. 15 GDPR);
- b. demand the correction or completion of incorrect or incomplete data (Art. 16 DSGVO);
- c. revoke a given consent at any time with effect for the future (Art. 7 para. 3 DSGVO);
- d. object to data processing based on a legitimate interest for reasons arising from your particular situation (Art. 21 (1) DSGVO);
- e. in certain cases, within the framework of Art. 17 DSGVO, to demand the deletion of data in particular insofar as the data is no longer required for the intended purpose or is processed unlawfully, or you have revoked your consent in accordance with (c) above or declared an objection in accordance with (d) above;
- f. under certain conditions, to demand the restriction of data which, to the extent that deletion is not possible or the obligation to delete is disputed (Art. 18 DSGVO);
- g. to data portability, i.e. you can receive your data that you have provided to us in a common machine-readable format, such as CSV, and transfer it to others if necessary (Art. 20 DSGVO);
- h. complain about data processing to the competent supervisory authority.

Where can I find detailed description of Microsoft Teams?



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For more information about Microsoft Teams, visit: https://docs.microsoft.com/de-de/microsoftteams/teams-privacy.

