

## PRIVACY NOTICE

### 1. Introduction

Sandvik Turkey, Zümrütevler Mah. Acarlar Sok. No.1 34852 Maltepe, Istanbul, Turkey ("Sandvik") collects and processes personal data ("Personal Data") about you received from DMG MORI sales office in Turkey in connection with purchase of Sandvik Coromant Tooling Certificates by the company you are employed in or are representing.

Throughout this Privacy Notice the term "processing" is used to cover all activities involving your Personal Data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of information.

"Applicable Data Privacy Laws" means the local data privacy law applicable to the Sandvik legal entity acting as data controller for your Personal Data, including for example (for Sandvik entities established in the EU/EEA-area (European Economic Area)), and the General Data Protection Regulation (2016/679).

Under the General Data Protection Regulation "Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. Purposes of the processing of your Personal Data

#### 2.1. Entering into and administering business contracts

Sandvik will process your Personal Data for the purposes of entering into and administering business contracts and other arrangements with Sandvik's customers - in this case with the company you are employed in or are representing regarding Sandvik Coromant Tooling Certificates and to deliver the product. Personal Data processed for this reason may include:

- Name
- Business contact details (such as email, telephone number and postal address).

Your Personal Data processed in accordance with this section 2.1 is processed on the basis of Sandvik's legitimate interest of entering into and administering business relationships with Sandvik customers.

#### 2.2. Establish, exercise and defend legal claims

Sandvik may process your Personal Data for the purposes of establishing, exercising and defending potential legal claims. Personal Data processed for these purposes include:

- Name
- Business contact details (such as email, telephone number and postal address).

Your Personal Data processed in accordance with this section 2.2 is processed on the basis of legitimate interests. Sandvik has a legitimate interest to process your Personal Data for these

purposes in order to be able to establish, exercise and/or defend legal claims, for example in the event of a dispute or controversy between the company you are employed in or representing and Sandvik.

2.3. Fulfillment of corporate legal obligations

Sandvik may also process your Personal Data to fulfill legal obligations such as tax and accounting requirements and anti-money laundering legislation.

- Name
- Business contact details (such as email, telephone number and postal address).

3. Disclosure and transfer of Personal Data

Group companies

Sandvik may disclose Personal Data processed for the purposes set forth in section 2 above to other companies within the Sandvik group. Such recipients may be located in countries outside the EU/EEA-area (European Economic Area). To ensure adequate protection of your Personal Data when transferred within the Sandvik group, regardless to which country your Personal Data is transferred, both the transferring Sandvik entity and the receiving Sandvik entity have entered into the Sandvik group's intra-group data transfer agreement. This agreement obligates the receiving Sandvik entity to safeguard the Personal Data, for example, by including the European Commission's Standard Contractual Clauses in relation to the data transfer.

Other recipients

Recipient	Purpose of transfer	Legal basis
Sales Channel Partners	Process the order	Legitimate interest of Sandvik
Governmental authorities	To fulfill legal obligations in the areas of tax, anti-fraud and anti-money laundering legislation	Fulfillment of legal obligations.

Data processors acting on behalf of Sandvik

Moreover, Sandvik may disclose Personal Data to external parties, such as vendors and service providers which process Personal Data under the instructions of Sandvik. Where such disclosure entails transfers of Personal Data outside the EU/EEA, Sandvik will ensure that the European Commission's Standard Contractual Clauses have been entered into between the transferring Sandvik entity and the receiving external party. Alternatively, other safe guards will be put in place prior to such transfers.

Appropriate Safe Guards

You are, if so provided under Applicable Data Privacy Law and upon request, entitled to receive a copy of any documentation demonstrating that appropriate safeguards have been taken in order to protect your Personal Data during a transfer outside the EU/EEA regardless whether it is an intra-group transfer or a transfer to an external party.

For information regarding countries outside the EU/EEA to which your personal data may be transferred please contact: [privacy@sandvik.com](mailto:privacy@sandvik.com).

#### 4. How long do we keep your Personal Data?

Sandvik will store Personal Data for the period necessary to fulfill the purposes outlined in this privacy notice unless a longer storage period is required for legitimate reasons or required by law. The methods and criteria used to determine the storage periods include: (i) for the period of validity of the Sandvik Coromant Tooling Certificates, or sooner if the purpose for processing your personal data has been fulfilled and no legitimate reason exists for continuing to store the data; (ii) as required by a legal obligation to which Sandvik is subject (for example to retain book keeping materials); and (iii) to meet applicable statutes of limitations for example to exercise, establish or defend claims, litigation or investigations.

#### 5. Your rights

##### 5.1. Right of rectification and access

Sandvik will take steps in accordance with Applicable Data Privacy Law to keep your Personal Data accurate, complete and up-to-date. If you identify that any Personal Data related to you is inadequate, incomplete or incorrect, you are entitled to have the Personal Data corrected.

Moreover, if so provided under Applicable Data Privacy Law you also have the right to request access to the Personal Data that we process about you. Such request should be submitted at <https://www.home.sandvik/en/about-this-site/privacy/>.

As of 25 May 2018, you are also, if so provided under Applicable Data Privacy Law, entitled to:

- (i) Request confirmation whether or not Personal Data is processed and if that is the case access to your Personal Data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the Personal Data undergoing processing. If the request is made by electronic means, the information will be provided in a commonly used electronic format if you do not request otherwise;
- (ii) object to any processing of your Personal Data processed on the basis of a legitimate interest, on grounds relating to your particular situation;
- (iii) where Processing was based on your consent, the right to withdraw your consent at any time;
- (iv) have your Personal Data erased under certain circumstances;
- (v) restrict the processing of your Personal Data to only comprise storage of your Personal Data under certain circumstances; and
- (vi) receive a machine-readable copy of the Personal Data processed on the basis of your consent or on the basis that the processing is necessary in order to perform your employment contract, and which Personal Data have been provided to Sandvik by you (data portability).

##### 5.2. Complaints to the supervisory authority

If you believe that we illegally process your personal data, and provided that you are in the EEA, you can lodge a complaint with your supervisory authority in the EEA.

#### 6. Contact information

If you have any further questions or concerns regarding the processing of your Personal Data, please contact Sandvik on the contact details set forth below.  
[privacy@sandvik.com](mailto:privacy@sandvik.com).

If you have questions about your Sandvik Coromant Tooling Certificate, please contact your Sandvik Coromant or contractual partner business contact person.