

## **Siemens Healthineers Business Partner Privacy Notice**

Updated as of September 2, 2025

Protecting the security and privacy of personal data of contact persons (each a “Business Partner Contact”) at our customers, suppliers, vendors and partners (each a “Business Partner”) is important to Siemens Healthineers Co., Ltd. and its affiliated companies in China (together “Siemens Healthineers”). Therefore, Siemens Healthineers processes personal data in compliance with applicable laws on data protection and data security. Therefore, Siemens Healthineers processes personal information in accordance with the requirements of applicable laws and regulations on data protection and data security (such as the Personal Information Protection Law of the People's Republic of China, etc., hereinafter referred to as "Applicable Laws").

This notice will help Business Partner Contact understand the following:

1. Categories, purposes and legal basis for Siemens Healthineers to process personal data
2. Entrusted processing, sharing and disclosure of personal data
3. Storage and cross-border transfer of personal data
4. Retention period of personal data
5. Data Subject Right of the Business Partner Contact
6. How to contact us

### **1. Categories of personal data processed, purpose of the processing and legal basis**

- 1.1. “Personal information” means all kinds of information related to identified or identifiable natural persons that are electronically or otherwise recorded, excluding information that has been anonymized. “Sensitive personal information” is personal information that, once leaked or used illegally, may easily lead to infringement of the personal dignity of natural persons or the harm of the personal and property safety, including biometrics, religious beliefs, specific identities, medical health, financial accounts, whereabouts as well as personal information of minors under 14 years old.

Personal information processing includes, but is not limited to, the collection, storage, use, processing, transmission, provision, disclosure, and deletion of personal information.

- 1.2. In the context of the business relationship with Siemens Healthineers, Siemens Healthineers may processes personal data 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.

by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services;

- Administrating and performing customer surveys, marketing campaigns, market analysis, 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;
- Use of cookies on Siemens Healthineers website to record website visits for security analysis reporting and protection against cyber-attacks;
- Ensuring compliance with legal obligations (such as record keeping obligations), Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), and Siemens Healthineers policies or industry standards; and
- Solving dispute enforce our contractual agreements and to establish, exercise or defend legal claims.

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

- Contact information, such as full name, work address, work telephone number, work mobile phone number, work fax 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 necessarily processed in a project or contractual relationship with Siemens Healthineers or voluntarily provided by the Business Partner Contact, such as orders placed, payments made, requests, and project milestones;
- Information collected from publicly available resources, integrity data bases and credit agencies; and
- The IP address left by you when you visit the Siemens Healthineers website, but the IP address will only be analyzed in the event of a network attack;
- If legally required for Business Partner compliance screenings: information about relevant and significant litigation or other legal proceedings against Business Partners.
- The processing of personal data is necessary to meet the aforementioned purposes including the performance of the respective (contractual) relationship with Business Partners.

If Siemens Healthineers does not collect the respective personal data, the purposes described may not be met by Siemens Healthineers. Communicating with Siemens Healthineers on business matters, concluding contracts with Siemens Healthineers, providing the above mentioned personal data to Siemens Healthineers, or visiting the websites of Siemens Healthineers mean that you are aware of and agree to the collection and use of personal data according to this Siemens Healthineers Business Partner Privacy Notice.

## **2. Entrusted processing, sharing and disclosure of personal data**

### **2.1. Entrusted processing of personal data**

Siemens Healthineers may entrust relevant third parties to process personal information of contacts of business partners, such as system providers, data processing service providers, cloud service providers, for the purposes described in Article 1 above. At that time, Siemens Healthineers will require such third parties to take appropriate security measures to protect such personal information in accordance with the requirements of applicable laws and regulations, and such protection shall be equivalent to the personal information protection measures adopted by Siemens Healthineers.

### **2.2. Sharing of personal data**

2.2.1. The provision and disclosure of personal information will only take place in compliance with applicable laws and regulations. We do not sell or otherwise market personal data of business partner contacts to third parties. Except in the following cases:

- Potential acquirers of assets of all or part of Siemens Healthineers' business, or acquirers or acquirers of equity in Siemens Healthineers mergers, acquisitions or public offerings, and their advisors;
- When it comes to merger, acquisition or bankruptcy liquidation, if it involves the transfer of personal data, we will require new companies and organizations that hold the personal data of business partners to continue to process personal data in accordance with the content disclosed in this Privacy Notice. If a new company or organization holding personal information of business partner contacts needs to use personal data for purposes not specified in this Privacy Notice, the new company or organization will obtain the consent of the business partner contact in accordance with applicable laws and regulations.
- Third parties in connection with compliance with legal obligations or in making, exercising or defending legal claims. (For example, where permitted by law, in order to comply with legal requirements or to establish, exercise or defend legal claims, Siemens Healthineers may provide personal data to courts, law enforcement agencies, competent authorities, legislatures or lawyers as necessary.)

#### **2.2.2. Sharing with Affiliates of Siemens Healthineers**

We may share personal data of business partner contacts with our affiliates. However, we will only share necessary personal data and are bound by the purposes stated in this Privacy Notice. If our affiliates want to change the purpose of processing personal data, they will again seek the authorization and consent of the contact of the business partner.

### 2.3. Disclosure of personal data

Siemens Healthineers may disclose personal data of business partner contacts, for example:

- Disclosure is required by the law of China or the laws of any other country applicable to Siemens Healthineers;
- To the extent authorized or permitted by the laws of China or any other country applicable to Siemens Healthineers, for the purpose of protecting the legal rights of Siemens Healthineers or the vital interests of a third party; or
- In accordance with judicial process or the request of government authorities.

### 3. Storage and cross-border transfer of personal data

Siemens Healthineers will use, store and remotely access personal data within China and in areas where personal data of business partner contacts is required for the purposes described in Article 1 above. Since Siemens Healthineers is a multinational company and may collaborate with companies and their affiliates from different countries and regions, the recipients of personal information may be located outside of China. Therefore, we may allow our affiliates and related service providers (such as system providers) located outside of China to access, use or store personal data, subject to the requirements of applicable laws. Service providers employed by Siemens Healthineers (for data processing such as storage or maintenance) will also implement Siemens Healthineers' requirements and will also comply with the requirements of relevant personal data protection laws.

Subject to the compliance of applicable laws and regulations, the personal information above which you provided to us (If you are a business supplier contact: name, gender, contact number, email address, position, company name, work email address; if you are a business partner such as a distributor or reseller contact: name, email address, address; if you are a direct-sales customer contact: name, position, contact number, email address, company name, subject to the type of personal information actually received from you) will be shared with Siemens Healthineers headquarter, i.e. Siemens Healthineers AG, located in Germany, of which the contact information as well as the way to exercise your personal information subject rights is [dataprivacy.func@siemens-healthineers.com](mailto:dataprivacy.func@siemens-healthineers.com). The purpose for which it processes your personal information is to assist SHL in relationship management with business partners and to implement necessary compliance controls, while the means by which it processes your personal information includes collection, use, storage, retention and entrusted processing.

To protect the personal information to be transferred outside China, if required by applicable laws and regulations, we will enter into *Standard Contract for Cross-border Transfer of Personal Information* (the “China SCCs”) with overseas recipient, under which you will be named as a third-party beneficiary. You will also be entitled to the right as being a third-party beneficiary under the China SCCs if you do not refuse in an explicit manner within 30 days. Please feel free to contact us through the channels as provided in “How to contact us” below, if you want to understand more information in terms of the cross-border transfer of personal information (such as requesting a copy of China SCCs which we concluded with overseas recipient

or requesting the erase of your personal information, if applicable).

#### **4. Retention period of personal data**

Unless otherwise agreed when collecting business partner contact information (in the Contact Consent Form), we delete personal data when it is no longer necessary for the purposes for which it was collected and processed and where there is no mandatory retention obligation under relevant laws (such as statutory retention obligations under tax or commercial law).

If you want to take the initiative to request the corresponding deletion, you can contact the Siemens Healthineers Data Privacy Protection Department. If the retention period stipulated by laws and administrative regulations has not expired at that time, or it is technically difficult to delete personal data, Siemens Healthineers shall stop processing other than storage and taking necessary security protection measures.

#### **5. Personal data rights regarding contacts of business partners**

Subject to relevant legal requirements, affected business partner contacts may, subject to legal conditions, have the right to:

- Confirmation with Siemens Healthineers whether it is processing the personal data and, if so, the business partner contacts have access to the personal data;
- Correction of inaccurate personal data with Siemens Healthineers;
- Deletion of personal data with Siemens Healthineers;
- Withdraw consent at any time, but the withdrawal does not affect the legal effect of the previous processing of personal data based on consent; after the withdrawal of consent, Siemens Healthineers can only further process personal data based on other legal basis;
- Restricting the processing of personal data with Siemens Healthineers;
- Obtain a backup copy of the contact's personal data from Siemens Healthineers in a standardized, commonly used, machine-readable format, and request Siemens Healthineers to provide it to other recipients designated by the contact;
- Objection to further processing of the personal data concerned on the grounds of the specific circumstances of the contacts of the business partner;
- Objection to the processing of personal data based on the specific circumstances of the business partner's contact.

Please note that, where permitted by the law of China, if Siemens Healthineers is unable or practically difficult to comply with the above requirements, Siemens Healthineers may refuse all or part of the request of the business partner's contact and is only required to provide reasons for refusal to the business partner contact within a reasonable time. The following are the circumstances in which such requests may be denied in whole or in part:

- The requested information is directly related to Siemens Healthineers' fulfillment of legal and

regulatory obligations;

- The requested information is directly related to national security, national defense security;
- The requested information is directly related to public safety, public health, or significant public interest;
- The requested information is directly related to criminal investigation, prosecution, trial and enforcement of sentences;
- Siemens Healthineers has reasonable evidence to show that there is subjective malice or abuse of rights by the contact of the business partner;
- Responding to a request would result in prejudice to the legitimate rights and interests of business associates or other individuals, entities or organizations;
- It is difficult to obtain the consent of the business partner for the purpose of safeguarding the life and property of the business partner's contact or other natural person's major legitimate rights and interests; and
- The requested information involves a trade secret.

## **6. How to contact us**

The Siemens Healthineers Data Privacy Organization provides support with any data privacy related questions, comments, concerns or complaints or in case a Business Partner Contact wish to exercise any of its data privacy related rights as mentioned in Section 5 above.

The responsible Data Privacy Officer of Siemens Healthineers Ltd., China is Ms. Liu Ke Ke

Siemens Healthineers Ltd., China

E-mail address: [keke.liu@siemens-healthineers.com](mailto:keke.liu@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.