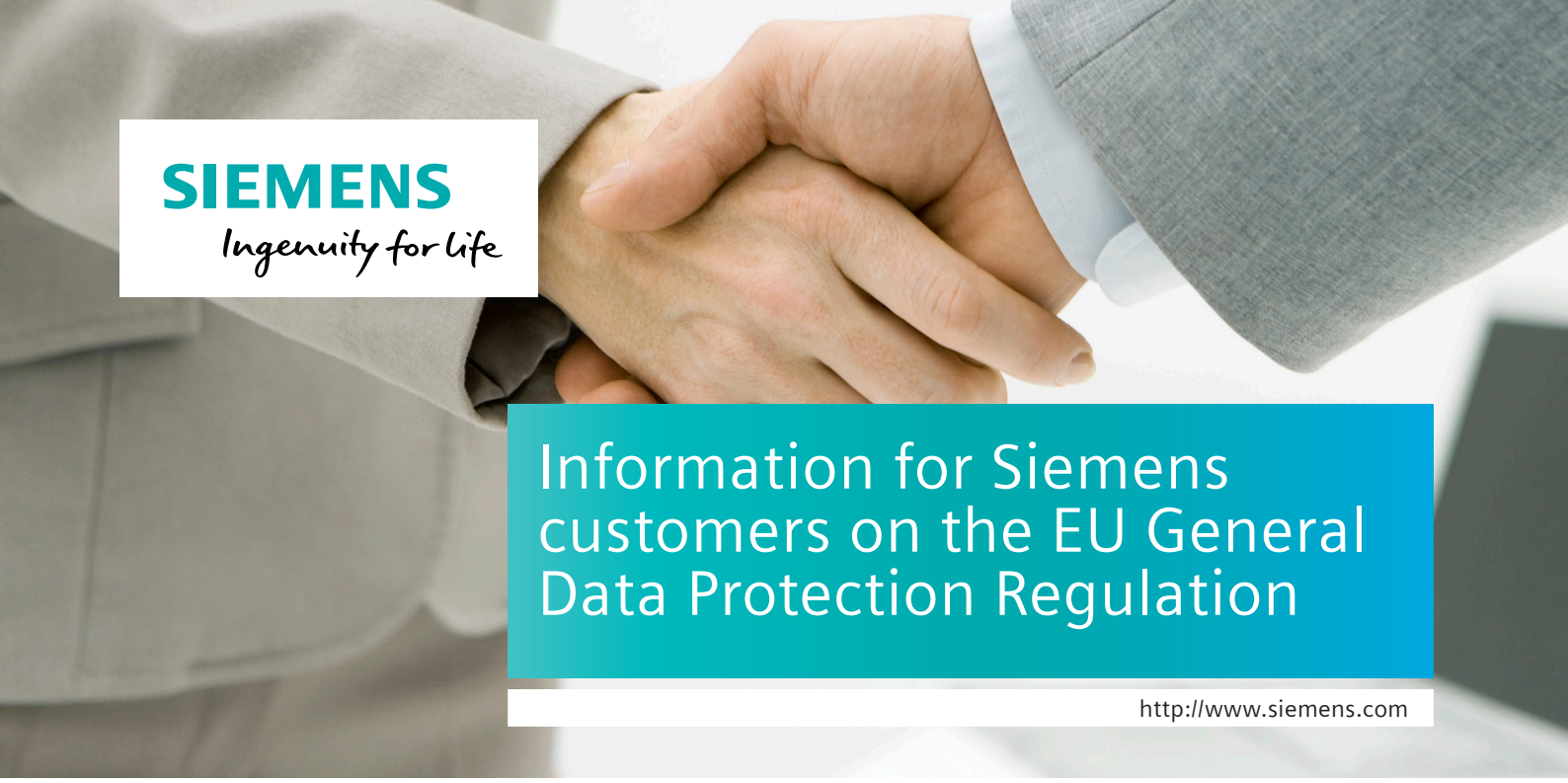

SIEMENS
Ingenuity for life

Information for Siemens customers on the EU General Data Protection Regulation

http://www.siemens.com

We consider data privacy to be part of a responsible way of working and living together. This applies equally to our employees, our business partners and their customers. Data privacy is part of Siemens' tradition, dating back even before the German Data Protection Act. We enforce data privacy globally not only in Germany. This means, we care for individuals' rights even where there is no legal obligation.

Data protection is very important to Siemens; also concerning cross-border transfers of personal data. For example, as one of the first companies in Germany, Siemens has introduced and implemented the Binding Corporate Rules ("BCR") within the Group already in 2014 to ensure a high level of data protection, also in third countries.

We also work on implementing the new European General Data Protection Regulation (GDPR). From 25th May 2018 the regulation will be directly applicable in each member state. This ensures an harmonized data protection standard across the Union.

This will have a significant impact on business: More transparency, less bureaucracy but also new obligations, for the first time also for data processors.

Siemens is working on implementing the new requirements. Our data privacy system already complies with many of the obligations, notwithstanding the need to adjust certain issues. The need for adjustment has already been identified and is being addressed by a detailed 400-day program in close cooperation with all affected Siemens affiliates to assure full compliance once the regulation comes into force.

The following aspects of the new law are of particular interest to our customers:

1. Privacy by Design

Companies have to take "Privacy by Design" into account when developing and creating new services and products.

"Privacy by Design" is a general requirement within the development of new services and products.

The data controller must ensure that data protection principles such as data minimization are already effectively implemented in the planning phase of new services and product developments through suitable technical and organizational measures in order to meet the requirements of the GDPR. When considering the specific measures, the current state of the art, the cost of implementation and the data processing inherent risk have to be taken into account amidst a multitude of other factors.

We already take into account data protection when planning and developing services and products. At certain milestones, we include data privacy, so that data privacy can already have an influence at an early point of time.

This is reflected above all in the following technical and organizational measures, which are regularly used in product safety:

- access control to personal data in the products
- compulsory use of passwords
- encryption (of data at rest and data in motion) where proportionate
- automatic log-out functions
- two-factor authentication, if necessary
- additional product specific measures

The customer is given many options to customize his product. The products developed by Siemens can therefore be customized according to the customer's requirements and depending on the sensitivity / criticality of the personal data to be processed. The customer is therefore free to use the technical and organizational measures and is free to decide whether and how to store personal data. This decision remains the responsibility of the customer especially when implementing the products in customer's specific IT infrastructure.

2. Data Processing on Behalf of the Controller

Apart from processing user contact data, we usually do not process personal data of our customers (or their customers). The principal responsibility remains with the customer who decides which personal data is collected and stored, i.e. where, how and for how long.

Whenever Siemens has access to personal data (e.g. through a service and maintenance contexts) Siemens may be qualified as data processor according to article 28 GDPR. Consequentially certain contractual provisions, including technical and organizational measures have to be entered into. This used to be specified in § 11 of the German Data Protection Act. If you see cause for adjustment of your current contract with regard to data processing, please refer to your point of contact.