

Information on Data Protection according to GDPR

- Supplier and their employees -

As controller within the meaning of the GDPR, we take the protection of personal data seriously and process it in accordance with statutory regulations.

1. Controller for data protection purposes

Controller is the company with which the supplier contract has been concluded.

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- Aareon UK Ltd, Building 500, Abbey Park, Stareton, Kenilworth, CV8 2LY, United Kingdom, e-mail: uk.reception@aareon.com

2. Contact with the Data Protection Officer

- of the first two Aareon-companies by email: datenschutzbeauftragter@aareon.com
- of the Aareon RELion GmbH (former mse companies) by e-mail: d.klapproth@ains-a.de
- of Calcon Deutschland GmbH by e-mail: t.ewald@capcad.de
- of phi-Consulting GmbH by e-mail: datenschutzbeauftragter@phi-consulting.de
- of Aareon Finland Oy, Aareon Norge AS, Aareon Sverige AB by e-mail: dataskyddsbud@aareon.com
- of Aareon France SAS by e-mail: fr-dpo@aareon.fr
- of Aareon Nederland B.V. by e-mail: privacy@aareon.nl
- of Aareon UK Ltd. by e-mail: dp@aareon.com

3. Purpose and Lawfulness of Processing

Execution of the supplier relationship and fulfillment of contract according to Art. 6 Abs. 1 b) GDPR.

4. Data and Categories of Data

Suppliers and „Third Parties“ (as far as natural persons)	Billing and payment data
	Address
	Bank details
	Creditworthiness data
	Data that is collected in the course of a contract partner check.

	Photos
	Date of birth
	Where applicable, data for the identification of beneficial owners in accordance with the Money Laundering Act
	Data provided in the course of a due diligence
	Communication data (e-mail data, dialed phone numbers)
	Contact details (phone, fax, e-mail)
	Reporting of times spent on projects/trainings
	Name + name supplements (Mr./Mrs., academic title)
	Personalized work results in various tools (ticket system, wikis, development systems, project management tools)
	Skills
	Date management (calendar data)
	Contract data (content of the contract and data for contract processing)
	Contract number, supplier number
Employees of Suppliers and „Third Parties“	Address
	Details of previous contacts
	Data collected in the context of a contract partner check
	Photos
	Date of birth
	Data provided in the course of a due diligence
	Content (tender documents, brochures, presentations, correspondence)
	Communication data (e-mail data, dialled phone numbers)
	Contact details (phone, fax, e-mail)
	Reporting of times spent on projects/trainings
	Name + name supplements (Mr./Mrs., academic title)
	Personalized work results in various tools (ticket system, wikis, development systems, project management tools)
	Skills
	Date management (calendar data)

5. Recipient and Categories of Recipients

Relevant employees of involved departments and associated companies, processors. Aareon uses Microsoft Office applications (e.g. Word®, Outlook®) and in Central Purchasing, systems for ordering and invoices from Coupa® with Kofax® and for payment of SAP®, where support can be provided with possible access to data from outside the EU/EEA (USA, worldwide). SAP® support can be provided from the EU/EEA and Switzerland, which is a secure third country with an adequacy decision by the EU Commission. Microsoft®, Coupa® and Kofax® are subject to EU Standard Contractual Clauses (SCC). For Microsoft Support, the SCC can be viewed in the Microsoft Trust Center.

Aareon is obliged to cooperate in the fight against terrorism and carries out a data comparison with EU/US anti-terror lists and in UK also the UK anti-terror lists (sanction screening). The comparison is performed regarding the supplier, not its employees. Aareon uses the AEB system for this purpose, for which support can be provided from outside the EU/EEA (UK, Singapore) if required. The UK is considered a safe third country in accordance with the EU Commission's adequacy decision, and EU standard contractual

clauses apply to support from Singapore. In the case of international data transfer to or access from outside the EU, there are special risks for personal data (e.g. access by foreign intelligence agencies).

6. Storage Period

The data for contract fulfillment or sanction screening will be stored in compliance with the legal retention periods up to

- Germany: 10 years
- UK: 7 years
- The Netherlands: 10 years
- France: 10 years
- Sweden: 7 years
- Finland: 10 years
- Norway: 5 years

after termination of the supplier relationship or performance of the sanction screening. Data that is no longer needed will be deleted.

7. Data Subject Rights

Data subjects may request information from the controller on their personal data, are entitled to have that data rectified, erased or processing of it restricted, may revoke their consent to processing or oppose the processing based on a legitimate interest at any time for the future, and have the right to data portability and to lodge complaints with a supervisory authority.

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