

Processing of personal data in supplier-customer relationships

The following privacy information applies to you if you are a business partner of Aricoma Group or an authorized representative, agent, employee or statutory body, partner or end user of benefits, or if you use the services of an authorized service provider for your devices and systems. Business partners of the Aricoma Group are legal and natural persons who are negotiating with an Aricoma Group company to establish a business relationship or are already parties to such a business relationship.

CONTENTS:

- Controller of your data
- Purposes of processing your data
- Legal basis for processing your data
- Your data that we process
- Recipients of your data
- Duration of storage of your data
- What are your rights

Controller of your data

All Aricoma companies are jointly the controller of your data. We are joint controllers because we handle this agenda as uniformly and jointly as possible. We work together on the basis of a written contract which has the following essential elements:

- The exercise of the rights of the subjects will be possible through the contacts of one of the controllers in the section 'What are your rights'.
- The obligation to provide information will be performed jointly by all controllers

Purposes of processing your data

We process your personal data to the extent necessary for the purposes of:

- negotiating the terms of contractual relationships,
- verifying the status and selecting suitable business partners,
- performance of contractual obligations and the terms and conditions of the services used,
- performance of obligations arising from generally binding legal regulations, such as accounting for business transactions,
- maintaining a database of contacts of customer representatives, business partners and service customers,
- ensuring the protection of our rights and legitimate interests, including the assertion of legal claims and the avoidance of negative legal consequences,
- fulfilling obligations under third party terms and conditions in the case of the provision of authorised warranty and post-warranty service.



The joint controllers also use your data to pursue liability claims and avoid legal risks and negative economic consequences, to detect and process potentially harmful emails, to control access, to prevent crime, to process digital signatures of contracts efficiently and quickly, to check the validity of electronic signatures and for other internal administrative purposes (e.g. user and contract management, project control and approval), as well as to comply with legal requirements for the storage and identification of information, e.g. in connection with anti-money laundering legislation, tax, audit and reporting obligations, and data processing requirements of government authorities such as the police.

Legal basis for processing your data

The processing of personal data is mainly carried out on a legal basis for the performance of contractual obligations and the introduction of pre-contractual measures, for the fulfilment of a legal obligation, for the purposes of our legitimate interests, which include in particular the introduction of security measures and the protection of our interests in the event of litigation, and exceptionally also on the basis of consent.

Your data that we process

We usually obtain your personal data directly from you. However, in some cases it may be necessary to process personal data that we obtain from other companies or publicly available sources (online surveys) or from other third parties in order to comply with legal obligations or in our legitimate interest (e.g., as part of a compliance check with a business partner).

We process the following categories of your personal data:

- **Identification data** - for the purpose of your unique identification, we process personal data in the following scope: name, surname, degree, nationality, signature specimen.
- **Contact details** - in order to contact you, we process personal data in the following scope: e-mail, phone numbers, company or contact address, content of communication.
- **Address data** - in order to deliver the ordered goods or serviced equipment to you, we process personal data in the scope of the contact person's name and surname, telephone number, delivery address.
- **Job classification** - in order to determine your position in the business partner's company in the context of our business relationship, we process data such as job position, job title and department in the company, supervisor, data on company structures and ownership, photos and video footage, username.
- **Signature including digital signature** - if you enter into a contract with us by means of a digital signature, we will process your related personal data (in particular your e-mail address, IP address, the times when you processed the respective contractual document). Some contracts can also be signed with a so-called qualified digital signature. In this case, in addition to the data mentioned above, we also process data about the certificate of your signature (which may include, for example, a unique identifier). This personal data is accessible to all persons involved in the approval and signing of the contract.

Recipients of your data

Controllers share your personal data between them. If the processing of personal data is based on your consent, your personal data may be transferred to KKCG group companies, in particular to the companies listed on <https://kkcg.com/cs/business>.

The data will be accessible to our authorised personnel. In this case, access will only be granted if it is necessary for the above-mentioned purposes and only if the employee is bound by a duty of confidentiality.



To the extent necessary, we may share your data with other third parties, such as providers of standard enterprise software tools that we use in our companies, consultants and subcontractors involved in providing your services, including our service partners, or carriers and delivery services.

Under certain conditions, your personal data may be disclosed to government authorities (Police, courts, Tax Administration, etc.) in the exercise of their legal powers.

Duration of storage of your data

We process your personal data for as long as the business relationship between the company you represent and ourselves is established and continues. Thereafter, we may continue to retain and process your personal data for the purposes and for the period for which we are required to do so under generally applicable laws, in particular under tax and accounting regulations, which provide for a retention period of up to 10 years, and for the period necessary to pursue our legitimate interests, such as managing the history and development of customer relationships, references, compliance or the protection of our rights.

What are your rights

Under the GDPR, you have certain rights in relation to the processing of your data. Here is a list of these rights and what each right means to you.

- **Right to access** - you have the right to a copy of the personal data we maintain about you and some details about how we use it. Your information will usually be provided to you electronically, or if you have made a request in writing, the information will be provided to you in writing wherever possible.
- **Right to correction** - we take reasonable steps to ensure the accuracy and completeness of the information we keep about you. It is important that we have the correct information about you and we ask you to inform us if any of your personal information is incorrect, for example if you have changed your name or delivery address.
- **Right to erasure** - under certain circumstances, you have the right to ask us to erase your data, for example when the data that we have collected is no longer necessary for the original purpose. When we have processed the data for longer than is strictly necessary, or when you withdraw your consent. We may have legal and regulatory obligations that prevent us from complying with your request, for example, if we are required to keep data in the accounting records.
- **Right to restriction of processing** - under certain circumstances, you may ask us to stop using your data, for example if you believe that the data, we maintain about you may be inaccurate or if you believe that we no longer need to use your data. From the point at which you have requested that we correct your Personal Data, or where you have objected to processing, and until we are able to investigate the problem or confirm the accuracy of your Personal Data (or amend it as you instruct), you have the right to restrict processing. This means that we will only retain and further process your data in accordance with your consent where it is necessary in connection with legal claims, to protect the rights of another or where there is a significant public interest in the processing. You can also ask us to restrict the processing of your personal data if the processing is unlawful but you do not want us to delete the personal data.
- **Right to data portability** - Right to data portability - you have the right to ask us to transfer the data you have provided to us on the basis of your consent or for the purpose of entering into or performing a contract. You may request that the data be transferred to a third party of your choice and we will comply if it is technically possible.
- **Right to object** - you have the right to object to processing on the basis of our legitimate interests. If we do not have sufficient legitimate reasons for processing when you object, we will not process your data further.



- **Rights concerning automated decision-making** - You have the right to object to automated decision-making, including profiling, that has a legal or similar significant effect on you. If you have been subject to automated decision-making and you disagree with the outcome, you can contact us using the contact details below to ask us to review the decision.
- **Right to withdraw consent** - in most cases, we do not process your data on the basis of your consent. However, in certain cases we may ask you for your permission. Where we process your data for which you have provided approval, you are entitled to withdraw that consent at any time. If you wish to withdraw consent to processing and there is no other legal reason for processing your data, you have the right to erasure or restriction of processing.

You can exercise your rights by sending a written request by post to one of our [sales office](#) or electronically to gdpr@aricoma.com. If you believe that the processing of your data is not in order, you can file a complaint with the Data Protection Authority. If you have any questions, please email us at gdpr@aricoma.com.