

# Data Privacy Policy for Suppliers



We take the protection of your personal data very seriously. This Data Privacy Policy ("Data Privacy Policy") applies exclusively within the scope of the General Data Protection Regulation ("GDPR") and informs you about the processing of personal data. The Data Privacy Policy applies to suppliers and service providers ("Suppliers") with regard to personal data which is transmitted to us, in particular from or in connection with the delivery of products, the provision of services, the initiation, conclusion and performance of contracts or which we collect and process in this context. The Data Privacy Policy also applies to supplier portals that we use (including the Arcus supplier platform). In individual cases, supplementary conditions may apply, to which we shall then refer separately.

## Personal data from suppliers

We process personal data of employees or contact persons of suppliers that we receive from or in connection with the delivery of products, the provision of services and from or in connection with the initiation, conclusion and performance of contracts. This includes, in particular, title, name, business contact data (e.g. address, telephone number, mobile number, e-mail address) and further data which are transmitted to us by the supplier or result from the respective context (e.g. associated supplier, position or function at the supplier, activity as a permanent or freelance employee of the supplier, special knowledge or skills, nationality, language, authority to represent, location or branch of the activity, duration of the activity at the supplier).

In the case of sole traders, self-employed persons, freelancers or other individuals acting as suppliers or service providers, we collect and process personal data associated with the supplier's business or entrepreneurial activity, in particular personal tax number, VAT identification number, bank details, information on services provided and their billing.

In the case of deliveries and services billed on a time and material basis, working hours (in particular duration, date and time), information on business trips (in particular duration, means of transport, hotel, travel expenses) and services rendered by individuals may also be recorded and processed.

We may supplement existing information from publicly available sources, in particular from the supplier's website, trade registers, address databases and company directories. We also use services to provide economic information on the creditworthiness and performance of companies.

We do not process any special personal data (Art. 9 GDPR) in relation to suppliers or their employees, unless this is mandatory due to legal provisions.

## Purposes of the processing

We process the personal data of suppliers in connection with the initiation, conclusion and performance of contracts. The processing also includes, in particular, the use of the data for contacting and communicating, making appointments, controlling and managing access to Tower Supplies facilities or buildings, making and receiving declarations, and recording and billing for services.

Furthermore, we store and process personal data of suppliers insofar as this is necessary to comply with statutory regulations (in particular, reporting regulations, import and export regulations, sanctions lists, laws against money laundering, trade restrictions, retention obligations under commercial and tax law, workplace safety regulations, compliance with provisions under labour law and collective bargaining agreements, including in particular compliance with regulations relating to illicit work, unlawful hiring out of employees, compliance with minimum wages). Furthermore, we store and process personal data of suppliers in order to manage, maintain and optimize the supplier relationships efficiently, transparently and in a documented manner. The use of personal data also includes in particular the use for the following purposes: ensuring the availability of goods and services; ensuring functioning supply chains; checking the reliability, credit worthiness and financial stability of suppliers; ordering securities; evaluating suppliers according to economic criteria; compliance of the supplier with specifications, requirements and guidelines of Tower Supplies; checking and documenting the quality and quantity of services; compliance with product related requirements and legal obligations (e.g. from product safety); checking and documenting the correctness of invoicing; asserting claims and defending in and out of court; ensuring the integrity and security of our systems (including IT systems), facilities, equipment and buildings; managing supplier access to IT systems and records of IT system use; accounting and preparing financial statements; conducting inspections and audits; exercising domestic authority (including visitor management and access control); organizing events (trade fairs, events, training courses, etc.); preventing damage to property and property rights; prevention of damaging behaviour and investigation of criminal offences; statistical evaluation and analysis of suppliers with regard to their deliveries, services and prices.

## Legal basis

We process personal data of suppliers for the above-mentioned purposes for the initiation or performance of a contract, for the fulfilment of legal obligations and in our legitimate interest. Our legitimate interest lies in the pursuit of the above-mentioned purposes, in particular in managing, maintaining and optimizing our supplier relationships efficiently, transparently and in a documented manner. In other cases, we process personal data of suppliers on the basis of consent, contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

# Data Privacy Policy for Suppliers cont...



## Disclosure of personal data within Tower Supplies and to third parties

We treat personal data of suppliers confidentially in accordance with the applicable data protection laws. General and special contractual agreements on the confidentiality of information remain unaffected. As a matter of principle, we only pass on personal data within Tower Supplies in so far as this is necessary to fulfil the above-mentioned purposes. Insofar as purchasing and procurement of goods and services is carried out by Tower Supplies.

Personal data of suppliers will only be passed on to third parties if this is necessary and legally permissible for the above-mentioned purposes. Personal data of suppliers may be passed on to various third parties, in particular in the context of the initiation, conclusion and execution of contracts. These include, in particular, service providers for business information and agencies, logistics service providers, consulting companies (including lawyers, tax consultants, auditors), banks and payment service providers.

The transmission of personal data to domestic and foreign courts, authorities or other state institutions shall only take place within the framework of the statutory provisions or if there is a justified interest in this.

responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## Use of purchasing platforms

We may use third-party purchasing platforms (e.g. Arcus) to manage our supplier data, which also enable independent registration by the supplier independent of a contractual relationship or a business relationship with Tower Supplies. In the event of such independent registration by the Supplier, the provider of the purchasing platform is responsible for the data processing of the corresponding data of the Supplier. Information on data processing, in particular by Arcus trade Interchange, can be found at <https://tradeinterchange.com/arcusprivacypolicy/>

## Duration of the data processing

We process personal data as long as necessary for the above-mentioned purposes, i.e. generally for the duration of the business relationship with the supplier, the complete implementation and settlement of the contractual relationship and in accordance with the statutory retention obligations, in particular in accordance with commercial and tax law.

## Data security

We take technical and organizational security measures to protect the personal data we manage against destruction, loss, alteration or unauthorized disclosure access. All personal data provided by you when using personalized services will be transmitted to us in encrypted form. We use a state-of-the-art encryption process for this purpose. Your personal data is password protected on all systems in which it is stored. The persons who have access to it are prohibited by strict security regulations from disclosing your data to third parties. Our security measures are continuously improved.

## Your rights

You have the right to information about and access to the personal data concerning you, the right to rectification, the right to erasure, the right to restriction of processing, the right to the assertion of a right to object to processing as well as the right to data portability, in each case in accordance with the statutory provisions. Insofar as the processing of personal data is based on your consent, you have the right to revoke your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation.

You have the right to lodge a complaint with the competent supervisory authority in accordance with the legal provisions if you are of the opinion that the processing of personal data concerning you violates the legal provisions. For this purpose, you may in particular contact the authority in the EU Member State of your residence or of the place of the alleged infringement.

A list of national data protection authorities within the EU and EEA can be found at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_de](https://edpb.europa.eu/about-edpb/about-edpb/members_de).

## Contact details of the data protection officer

If you have any questions or suggestions on the subject of data protection, please feel free to send them by e-mail or letter to our data protection officer, who can be reached at the following contact details:

By e-mail: [it@towersupplies.com](mailto:it@towersupplies.com)

By post: IT, Tower Supplies, 3 Yarrow Road, Poole, Dorset, BH12 4TS

## Subject to change

We reserve the right to change these data protection provisions at any time within the framework of the applicable laws. Please also note the respective terms of use and general terms and conditions when using our Internet pages.