

## Data protection information for business partners

The following informs you in accordance with the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) about the processing of your personal data as Gludan (Deutschland) GmbH's business partner (m/f/d), as well as Gludan (Deutschland) GmbH's group companies, departments and groups.

According to Art. 4 No. 1 GDPR, your personal data includes all information that relates to or can be associated with you, particularly by reference to an identifier such as your name or customer number, which allows your identification.

As a data processor, we provide this data protection information ("Notice") for business partners to explain our data processing practices regarding our customers, business partners, and suppliers (collectively, "Business Partners") and, where applicable, their employees associated with Gludan (Deutschland) GmbH.

This English version of the Data Protection Information is provided for convenience and transparency only. The official and legally binding version is the German version. In the event of any discrepancies or inconsistencies between the English and German versions, the German version shall prevail.

### Controller for the processing of your personal data

Unless otherwise contractually agreed, the controller for the collection, processing, and use of your personal data is:

Gludan (Deutschland) GmbH, Am Hesterkamp 2, 21514 Büchen, Germany

### Scope

This notice applies if you are a business partner of Gludan (Deutschland) GmbH or an employee of a business partner acting on their behalf in dealings with Gludan (Deutschland) GmbH.

### Categories of personal data and data sources

Gludan (Deutschland) GmbH may process the following of your personal data, your company or third parties:

- **Personal data relating to business partners:** Name, business contact information, services or products offered, contract information, communication content (such as emails or business letters), payment information, billing information, and business relationship history
- **Personal data relating to employees of a business partner:** name, business contact details, employer name, title/position and communication content (such as emails or business letters).
- Personal data collected from publicly available sources or from general credit reporting agencies.

### Data processing purposes, legal basis and consequences

Your personal data are processed for the purposes of initiating, implementing and terminating the contractual relationship with the business partner (including the fulfilment of contractual performance obligations, invoice processing, communication and compliance with legal regulations), for marketing and CRM activities and for fraud prevention.

Gludan (Deutschland) GmbH relies on the following legal bases for data processing:

- Initiation, execution and termination of the contractual relationship with the business partner (Art. 6 para. 1 lit. b GDPR);
- Legitimate interest of Gludan (Deutschland) GmbH, (Art. 6 para. 1 lit. f GDPR). Legitimate interests may include, in particular, marketing and CRM activities, as well as the prevention of fraud, IT misuse, money laundering, operation of a whistle blower system, physical security, IT and network security, and internal investigations;
- Consent (Art. 6 para. 1 lit. a GDPR);
- Fulfilment of legal obligations (Art. 6 para. 1 lit. c GDPR);

The provision of personal data is necessary for the initiation, conclusion and/or performance of the contractual relationship and is voluntary. However, if you do not provide this data, it could delay or even hinder the business partner management and administrative processes.

### **Categories of recipients**

Gludan (Deutschland) GmbH may use service providers acting as processors to provide IT and other administrative support (e.g. service providers providing IT hosting or maintenance support). These service providers may have access to your personal data to the extent necessary to provide such services. Where appropriate, personal data may be transferred to courts, public authorities, law firms or similar third parties, if this is legally permissible and necessary for compliance with applicable law or for the defence or assertion of legal claims.

If, it is necessary to fulfil the purpose Gludan (Deutschland) GmbH may transfer personal data within the group.

Any access to your personal data is limited to those who need the information to complete your activities.

### **Retention period**

The personal data are stored by Gludan (Deutschland) GmbH and its service providers for as long as necessary until our obligations are fulfilled. The data will be backed up for as long as necessary for the purpose in accordance with the GDPR. As soon as Gludan (Deutschland) GmbH no longer needs the data to fulfil contractual or legal obligations, it will be removed from our systems and records and/or your personal data will be properly anonymized and no longer identifiable.

Exceptions include cases where we are required to retain your personal data to comply with legal or regulatory obligations to which Gludan (Deutschland) GmbH is subject. For example, statutory retention periods under the German Commercial Code, tax law, or the Money Laundering Act, which typically range from 5 to 10 years, or if we need to secure evidence within the limitation period, which is usually 3 years but can extend up to 30 years.

## Your rights as a data subject

You have the following rights, provided that the legal requirements are met:

- Right to access the data, Art. 15 GDPR  
You have the right to access your stored personal information.
- Right to rectification, Art. 16 GDPR

If you discover that incorrect personal data relating to you is being processed, you may request its rectification. Incomplete data must be completed, taking the purpose of the processing into account.

- Right to erasure, Art. 17 GDPR

You have the right to request the erasure of your data if certain grounds for erasure exist, unless our legitimate interests or a legal obligation require the processing to continue.

- Right to restriction of processing, Art. 18 GDPR  
You have the right to request the restriction of the processing of your data. This means that while your data will not be erased, it will be marked to restrict further processing or use.
- Right to data portability, Art. 20 GDPR  
You have the right to receive the personal data that you have provided to Gludan (Deutschland) GmbH in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller without hindrance from Gludan (Deutschland) GmbH.

- RIGHT TO OBJECT, ART. 21 GDPR

YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION (ART. 6 PARA. 1 LIT. E OR F GDPR). IN SUCH CASE, YOUR PERSONAL DATA WILL NO LONGER BE PROCESSED, UNLESS WE CAN DEMONSTRATE COMPELLING LEGITIMATE GROUNDS FOR THE PROCESSING WHICH OVERRULE YOUR INTERESTS, RIGHTS AND FREEDOMS, OR THE PROCESSING IS NECESSARY FOR THE ESTABLISHMENT, EXERCISE OR DEFENCE OF LEGAL CLAIMS. IF YOU HAVE ANY QUESTIONS REGARDING YOUR RIGHTS AND THE EXERCISE OF YOUR RIGHTS, PLEASE, CONTACT GLUDAN (DEUTSCHLAND) GMBH OR ITS COMPANY DATA PROTECTION OFFICER.

If you have given your consent to certain processing activities, your data will only be processed to the extent agreed in the consent. In these cases, your consent is voluntary and can be revoked by you at any time with effect for the future. This revocation will not affect the previous processing of

data. if you do not give your consent or if you withdraw your consent You will not suffer any disadvantages on a later occasion.

Furthermore, you have the right to lodge a complaint with any competent data protection supervisory authority if you believe that the processing of your personal data violates the GDPR (Art. 77 GDPR in conjunction with Section 19 BDSG). You can assert this right with a supervising authority in the member state of your place of residence, your place of work or the place of the alleged infringement. Gludan (Deutschland) GmbH's supervising authority is:

Unabhängiges Landeszentrum für Datenschutz Schleswig-Holstein, Holstenstraße 98, 24103 Kiel, Deutschland

Please note, the above rights may be restricted by national law.

### **Automated decision-making / profiling**

Gludan (Deutschland) GmbH does not use automated individual decision-making including profiling within the meaning of Article 22 GDPR.

### **The data protection officer of Gludan (Deutschland) GmbH can be contacted using the following contact details:**

BusinessRanger GmbH, Mittelstraße 11, 40789 Monheim am Rhein, Germany

E-mail: [datenschutz@gludan.de](mailto:datenschutz@gludan.de)