



ACV INTERNATIONAL NV - PRIVACY NOTICE TO SUPPLIERS

ACV INTERNATIONAL NV, with registered offices at 1653 Dworp, Oude Vijverweg, 6, Belgium and registered with the Crossroads Bank for Enterprises under the number 0464.842.608, acting as data controller, processes and uses personal data pertaining to personnel employed by its suppliers and service providers (hereinafter collectively referred to as “**Suppliers**”), in compliance with the applicable data protection laws, in particular the European Regulation 2016/679 of 27 April 2016 called the General Data Protection Regulation (hereinafter referred to as “**GDPR**”).

This privacy notice sets out why and how ACV INTERNATIONAL collects personal information about individuals of its Suppliers (hereinafter referred to as “**Supplier Data**”), how ACV INTERNATIONAL protects it and for how long this information is retained. This without prejudice to specific provisions set out in any contract entered into between ACV INTERNATIONAL and a Supplier.

1 Why ACV INTERNATIONAL processes Supplier Data

ACV INTERNATIONAL keeps and processes Supplier data, whether or not in electronic form, for supplier management and administrative purposes, including the following non-exhaustive activities: dealing with and responding to any communication, enquiry or request which a Supplier submit to ACV INTERNATIONAL, processing information relating to the purchase (actual or potential) of Supplier’s products and/or services, invoicing management and dispute resolution.

2 Legal grounds for processing the Supplier Data

Supplier Data is processed on one or more of the following legal grounds:

- Contract: To enter into and managing the performance of a sales related contract with a Supplier
- Legal Obligation: To comply with ACV INTERNATIONAL’s legal obligations or requirements
- Legitimate Interest: Processing is necessary for the legitimate interests of ACV INTERNATIONAL and/or a third party

The nature in which ACV INTERNATIONAL and/or a third party processes Supplier Data for legitimate interests is to follow guidance and recommended best practice of regulatory bodies, to facilitate the receipt of services from the Suppliers and for market research and analysis and developing statistics. ACV INTERNATIONAL will never process Supplier Data for legitimate interest unless the processing is necessary and appropriate balanced against the individuals own interest.



3 Categories of personal data which are processed as Supplier Data

Supplier Data is all personal information relating to an identified or identifiable natural person who is associated with or related to a Supplier. For the abovementioned purposes, the processing of personal data may include the following categories:

- personal identification data, such as name and address;
- electronic identification data, such as email address and phone number; and
- employment related data, such as job title and related employer.

4 Where Supplier Data comes from

When an individual of a Supplier contacts ACV INTERNATIONAL, the initial Supplier Data is likely to come from the individual concerned. ACV INTERNATIONAL may also contact an individual of a Supplier for quotation purposes when the initial data have not been obtained from such Supplier. During the course of the Supplier relationship, the individual concerned or another representative of the Supplier may provide ACV INTERNATIONAL with further information. If the Supplier does not provide ACV INTERNATIONAL with information that is required by law or contract, ACV INTERNATIONAL may decide not to enter into the contract or end its relationship with a particular Supplier.

ACV INTERNATIONAL may also receive or generate Supplier Data relating to an individual concerned from other suppliers, customers or those to whom these individuals communicate by email or other systems.

5 Who has access to the Supplier Data

For the abovementioned purposes, Supplier Data may be disclosed to, and possibly even processed by:

- the individuals themselves or other individuals employed by or representing the Supplier;
- ACV INTERNATIONAL's personnel who have a need-to-know about the Supplier Data at stake,
- the personnel of affiliates of ACV INTERNATIONAL and who have a need-to-know about the Supplier Data at stake;
- the public authorities in accordance with the applicable laws and regulations;
- ACV INTERNATIONAL's service providers who have a need-to-know about the Supplier Data at stake, such as IT and logistics providers; and
- other professional advisors of ACV INTERNATIONAL who have a need-to-know about the Supplier Data at stake.



6 Supplier Data transferred Internationally

ACV INTERNATIONAL may transfer information about Suppliers, including Supplier Data, to affiliates of ACV INTERNATIONAL for purposes connected with the management of the ACV INTERNATIONAL's business. It may also be necessary in limited circumstances to transfer the Supplier Data abroad or to an international organization to process and/or store this information to comply with our legal or contractual requirements. For transfers of data internationally, ACV INTERNATIONAL has implemented appropriate safeguards in line with GDPR requirements.

7 Retention of Supplier Data

Typically, Supplier Data is retained during the term of the contract as well following the expiration or termination of the applicable contract for as long as ACV INTERNATIONAL may have legal liability for which the use of Supplier Data can be relevant, taking into account the applicable statutory periods of limitation and legal retention obligations.

8 How Supplier Data is protected

ACV INTERNATIONAL keeps the Supplier Data as safe and secure as reasonably possible, protecting it against loss and unauthorised disclosure or access.

9 What are the individuals' rights and who can they contact?

Subject to the requirement of GDPR, the individuals who have personal information collected and processed as Supplier Data have the right at any time to contact ACV INTERNATIONAL to:

- access, rectify or erase their Supplier Data;
- restrict or object to the processing of their Supplier Data;
- data portability, allowing the individual to copy or transfer their Supplier Data;
- where an individual has provided consent to process their Supplier Data, to withdraw that consent at any time (which will not affect the lawfulness of the processing before consent was withdrawn); and
- receive more information about the safeguards in case of international data transfers.

Individuals also have a right to lodge a complaint with the Belgian Data Protection Authority or another EU supervisory authority if the individual thinks ACV INTERNATIONAL has not acted in line with any applicable data protection laws in respect of dealing with their Supplier Data.

The contact at ACV INTERNATIONAL for any further information about these rights is:

Catherine Delhay
ISO Manager
+32 479 80 77 92
privacy@acv.com



10 Changes

ACV INTERNATIONAL may amend this privacy notice from time to time as needed, notably to comply with changes in any applicable laws, regulations or requirements introduced by data protection authorities.