

Data protection information for Business Partners, Suppliers and Interested Parties

The following information is to inform you as a business partner, supplier or interested party or as the contact person of a business partner, supplier or interested party how LEONI Group companies handle the collection, use and disclosure of personal data.

1. Responsible body

The data controller for your personal data is LEONI AG or one of the LEONI Group companies, which you can find in the e-mail signature of your contact person.

2. Legal basis and purposes for the processing of your personal data

Your data is only processed if permitted by law, it is legally obligated to do so or you have voluntarily given your express consent to data processing.

Data processing for the execution of contracts:

The processing of your personal data may result due to the execution of pre-contractual measures that precede a contractual business relationship or due to the fulfilment of obligations arising from a concluded contract with you. For example, this may include the processing of purchase orders, deliveries or payments, or the preparation of and response to quotation requests from individuals, in order to determine or establish the terms of a contractual relationship (Art. 6 para. 1 lit. b GDPR).

Data processing due to legal obligations:

The data controller is subject to various legal obligations that may make it necessary to process your personal data (Art. 6 para. 1 lit. c GDPR). These legal obligations may for example result from tax law, commercial and foreign trade law or sanction law regulations.

Data processing on the basis of a legitimate interest:

It may be necessary to process your personal data in order to protect legitimate interests (Art. 6 para 1. lit. f GDPR). Legitimate interests are, in particular, the conclusion or execution of contracts and other business relationships with our business partners, suppliers or interested parties for whom you may be acting as a representative or as an employee.

Legitimate interests include internal administrative purposes (e.g. for accounting and payment processing) or to ensure IT security and operations, conduct compliance investigations, ensure building and facility security, to assert, exercise or defend legal claims as well as for external communication (e.g. video conferencing systems).

Sanction lists checks are also used to ensure that LEONI Group companies do not provide financial resources to listed persons (implementation of denied party screening).

A variety of international legal regulations requires that LEONI as a company reviews current and future business partners (business partner screening (BPS)) as part of our due diligence process. In order to comply with such compliance provisions, we implemented a process that allows for a profound BPS, which works with matching of various sanction lists. Moreover, we may use reports compiled by credit bureaus/rating agencies and analyses through media screening/news alerts. To a large proportion, the PBS process is a statutory requirement and it is necessary in order to enter into a contract with LEONI as we have to avoid potential risk, damage and loss.

LEONI also regularly organises virtual meetings with the help of external platforms to facilitate both internal and external exchanges between employees, customers and business partners.

Data processing based on your consent:

The processing of your personal data may be based on your voluntary consent within the meaning of Art. 6 para. 1 lit. a GDPR.

Under no circumstances will your data be passed on to unauthorised third parties. You can freely revoke your consent at any time with future effect in accordance with Art. 7 para. 3 GDPR. If your personal data is processed on the basis of consent, you will be informed about this in detail.

3. Data categories

The types of personal data processed of our business partners, including both suppliers and customers, in a proper sense, include master data (first name, surname, function and identity of the company) and contact data (business address, telephone numbers, fax number and e-mail address).

In addition, the agreements made within the framework of a contractual relationship are processed (communication history, contractual agreements, prices, negotiated goods, services, order history and associated offers and orders).

The personal data of you or your employees is generally collected directly from you personally in the context of an offer, contract conclusion phase or during the ongoing business relationship, or is communicated by your employer (who maintains a business relationship with the responsible body under point 1) in the context of the business relationship for its implementation.

Data related to the history of the business relationship (communication, contract details, contact persons, managers, etc.) accrue within the scope of the joint business relationship and are stored in our customer management system (CRM).

To account for the IT security concept, your usage data is also collected (e.g. log data).

In certain circumstances personal data is also collected from other bodies due to legal regulations or legitimate interests. This includes, in particular, event-related queries by credit agencies regarding economic reliability. In most cases however, this information relates to the company with which a contractual relationship exists and not to individuals, unless you yourself are the direct business partner and act and trade under your own name (e.g. as a registered merchant or as an individual on your own account).

4. Recipients of your personal data

Your data will only be passed on to third parties outside the responsible body (see section 1) if you have expressly consented to the transfer beforehand or if it is obliged to do so by law. The legal basis for this data processing is Art. 6 para. 1 lit. a GDPR in the case of consent or Art. 6 para. 1 lit. c GDPR in the case of legal obligation.

Data may be exchanged within the group for the purposes of contract fulfilment, project management or targeted marketing measures. In addition, data is processed by service providers on the behalf of LEONI. These are carefully selected and contractually obligated in accordance with Art. 28 GDPR.

5. Data transfer to third countries

If personal data is transferred to recipients outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection (adequacy decision), if an adequate level of data protection has been agreed with the data recipient (for example by means of EU standard contractual clauses) or if you have given us your consent in accordance with the requirements of Art. 49 of the GDPR.

6. Retention period

Personal data will be retained for as long as is necessary to fulfil the above-mentioned purposes or for as long as there are legal or contractual retention obligations.

7. Your rights as a data subject

As a data subject you have the right to information about personal data concerning yourself as well as the right to have inaccurate data corrected or data deleted, provided that one of the reasons stated in Art. 17 of the GDPR applies (e.g. if the data is no longer needed for the purposes pursued). There is also the right to restriction of

processing if one of the conditions listed in Art. 18 GDPR applies and, in the cases of Art. 20 GDPR, the right to data portability. If data is collected on the basis of Art. 6 para 1 lit. f GDPR, the data subject has the right to object to the processing at any time for reasons arising from his or her particular situation. Your personal data will then no longer be processed unless there are demonstrably compelling grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

Any data subject has the right to file a complaint with a supervisory authority if he or she considers that the processing of data concerning him or her infringes upon data protection law. The right to file a complaint may be exercised before a supervisory authority in the Member State of your residence, place of work or the place of the alleged infringement.

8. Contact details of the data protection officer

A data protection officer will be happy to provide you with information on the subject of data protection at the following e-mail address: data-protection@leoni.com.

Note: When contacting a data protection officer, please state the LEONI company with which you are in contact.