

## Supplier and Customer Privacy Notice

This Supplier and Customer Privacy Notice sets out what personal data we, Studsvik, hold about individuals within your organisation and how we collect and use it during our business dealings. It applies to anyone who is working with Studsvik directly through your organisation whether as an employee, worker, contractor, consultant, intern, volunteer or director (together referred to as ‘Supplier / Customer’ or ‘you’).

Please note that we will not necessarily hold, use or share *all* of the types of personal data described in this Privacy Notice in relation to you. The specific types of data about you that we will hold, use and share will depend on the nature of the engagement between organisations.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you issue this to relevant individuals within your organisation who it will be applicable to and ensure they read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation comes into force and supersedes all other documents and arrangements pertaining to the protection of your personal data. It does not form part of your contract of employment or other contract to provide service and does not give you any contractual rights. We may update this Privacy Notice at any time.

### Who is the controller?

The Studsvik entity you are doing business with is the “controller” for the purposes of data protection law, this entity is part of the Studsvik AB group. This means that we are responsible for deciding how we hold and use personal data about you.

### What is personal data?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, employee number, email address, work address).

Data protection law divides personal data into two categories: ordinary personal data and special category data.

### What type of ordinary personal data do we hold about you and why?

We collect, hold and use the following types of ordinary personal data about you:

- Basic information including your name, title and contact details
- Publicly available information about you, such as your business social media presence or information available on Company’s House
- General information, including correspondence, internal notes, the results of any selection testing

undergone

We hold and use this personal data so that we can:

- correspond with the correct person in your organisation;
- make our business dealings efficient and effective;
- pay you and be paid for services exchanged;
- seek business opportunities with or for you;

## **What are our legal grounds for using your ordinary personal data?**

Data protection law specifies the legal grounds on which we can hold and use personal data.

We rely on one or more of the following legal grounds when we process your ordinary personal data:

- We need it to take steps at your request in order to enter into a contract with you (**entry into a contract**).
- We need it to comply with a legal obligation (**legal obligation**).
- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**).

## **What type of special category personal data do we hold about you, why, and on what legal grounds?**

We will not collect, hold or use any types of special category data about you during our business relationship. If this is required for whatever reason, at whatever time, you will be consulted with and a separate Privacy Notice issued to that effect.

## **How do we collect your personal data?**

You provide us with most of the personal data about you that we hold and use, for example in the Studsvik forms you complete as part of engaging in business with us.

Some of the personal data we hold and use about you is generated from internal sources during business development activity. For example, the person you first engaged in conversation with may record details of your interactions.

Some of the personal data about you that we hold and use may come from external sources. For example, we may obtain information about you from publicly available sources, such as your LinkedIn profile, company website or

other media sources.

## **Who do we share your personal data with?**

### **Parent / group companies**

From time to time we share any of your personal data that is relevant, where appropriate, with group companies, for instance our parent company Studsvik AB, to enable them to input into our commercial and contractual arrangements. Our legal grounds for doing so are that: it is necessary for entry into a contract, and it is in our legitimate interest to obtain our parent company's approval of our business dealings and to comply with the procedures applicable within our corporate group.

### **Internal support functions**

Where applicable, our data may be made available to other support functions, like Commercial, SHEQ and HR for the purposes of contract and supplier review. Our legal grounds for doing so are that: it is necessary for entry into a contract; and it is in our legitimate interest to engage support functions to assist us our business dealings.

### **Legal / professional advisers**

We share any of your personal data that is relevant, where appropriate, with our legal and other professional advisers, in order to obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you. Our legal grounds for sharing this personal data are that: it is in our legitimate interests to seek advice to clarify our rights / obligations and it is necessary to establish, exercise or defend legal claims.

### **Other external companies**

We will not send any of your personal data to other external parties without your consent.

## **Consequences of not providing personal data**

We only ask you to provide personal data that we need to enable us to enter into and maintain a mutually beneficial business relationship. If you do not provide particular information to us, then it may become impossible for us to engage with you and we will have to make a decision on whether or not to continue without that information. For example, if we ask you to provide a named contact within your Accounts function and you fail to do, then raising and processing invoices between parties may become very difficult.

If you choose not to provide us with personal data requested, we will tell you about the implications of any such decision at the relevant time.

## **How long will we keep your personal data?**

We will keep your personal data for the duration of the business relationship.

If or when the business relationship terminates, we will keep your personal data for no longer is necessary. If there are no outstanding matters between parties then data will be removed up to one year from the date the relationship terminates. If there are outstanding matters between parties then it may be deemed appropriate to keep particular items of your personal data for longer until disputes are resolved. We will base these decisions on relevant circumstances, taking into account the following criteria:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up to date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

In all cases, we will not keep your personal data for longer than we need it for our legitimate purposes.

## **Your rights**

You have a number of legal rights relating to your personal data, which are outlined in the document GDPR at Studsvik.

If you would like to exercise any of your rights, please contact the relevant controller. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

Note too that you have the right to make a complaint at any time to the local government body responsible for data protection.