



# Customer/Supplier Data Protection Notice

## 1. Introduction and Scope

Koole Terminals is committed to Processing Personal Data responsibly and in compliance with the applicable data protection laws in all countries in which Koole Terminals operates.

This Customer/Supplier Data Protection Notice (the “**Notice**”) describes the types of Personal Data Koole Terminals collects, how Koole Terminals uses the Personal Data, with whom Koole Terminals shares the Personal Data, and the rights you, as a Data Subject, have regarding Koole Terminals’s use of the Personal Data. This Notice also describes how you can contact us about our data protection practices.

## 2. Contact Details of the Data Controllers

The entities responsible for the collection and use of your Personal Data (Data Controllers) in your home country for the purposes described in this Notice are set out in Annex 1.

## 3. Contact compliance officer

Koole Terminals has a compliance officer that is involved in all issues related to the protection of your Personal Data. In particular, the compliance officer is in charge of monitoring and ensuring compliance with this Notice and the applicable data protection laws. Your regular contact at Koole Terminals can get you in to contact with the Legal department of Koole Terminals for any clarification or additional information you may need to understand the notice.

## 4. Purposes of Data Processing and Legal Basis

Koole Terminals Processes Personal Data in accordance with applicable data protection laws and only for limited, explicit and legitimate purposes. Koole Terminals will not use Personal Data for any purpose that is incompatible with the purpose for which it was initially collected unless you provide your prior explicit consent for further use. Personal Data relating to Koole Terminals’ customers/suppliers may be Processed for the purposes of:

- Managing commercial relationships, order fulfillment, payment and invoicing for goods and services, contacting customer, contacting supplier;
- Carrying out promotional operations, direct marketing;
- Fraud detection and prevention;
- Security;
- Complying with legal obligations and/or regulatory investigations, assisting the Company in the context of any litigation or arbitration, including employment tribunal proceedings, and protecting the Company against injury, theft, legal liability, fraud, abuse or other misconduct;
- Managing Company transactions (e.g., merger or acquisition);

- Managing Company operations, including the operation and monitoring of the proper functioning and security of the Company’s IT systems;
- Managing health and safety incidents; and
- Managing product deliveries and shipments.

The legal basis for each purpose is listed in the chart below:

Purposes	Legal basis
Managing commercial relationships, order fulfillment, payment and invoicing for goods and services, contacting customer, contacting supplier	B-to-B: Legitimate interest to run Company’s business as appropriate to deliver and improve its products or services
Carrying out promotional operations, direct marketing	Legitimate interest to promote Company’s position on the market
Fraud detection and prevention	Legitimate interest to ensure security and integrity of Company
Security	Legitimate interest to ensure security and integrity of Company
Complying with legal obligations and/or regulatory investigations, assisting the Company in the context of any litigation or arbitration, including employment tribunal proceedings, and protecting the Company against injury, theft, legal liability, fraud, abuse or other misconduct	Legal obligation and Legitimate interest to ensure proper functioning of the Company
Managing Company transactions (e.g., merger or acquisition)	Legitimate interest to conduct Company’s business dealings
Managing Company operations, including the operation and monitoring of the proper functioning and security of the Company’s IT systems	Legitimate interest to ensure security and safety of Company
Managing health and safety incidents	Legitimate interest to ensure security and safety of Company
Managing product deliveries and shipments	B-to-B: Legitimate interest to run Company’s business as appropriate to deliver and improve its products or services

Koole Terminals ensures that our internal governance procedures clearly specify the reasons behind decisions to use Personal Data for further Processing purposes. Prior to using your



Personal Data for a purpose other than the one for which it was initially collected, you will be informed about such new purpose.

## **5. Categories of Personal Data Processed**

The provision of Personal Data is a requirement necessary to enter into a contract with Koole Terminals or a requirement by law or regulation for Koole Terminals to administer your customer/supplier relationship. The Personal Data Processed is limited to the data necessary for carrying out the purpose for which such Personal Data is collected.

Personal Data Processed includes the following:

- Customer name, gender, age, address, date and place of birth, phone number, email address, nationality, occupation/title, name of organization, department, industry, date of agreement, business postal address, business telephone number, business facsimile number, business email address, VAT numbers, tax identification numbers, bank details, bank ownership certificate, language preference, license plate number, driver's license;
- Customer CCTV images;
- Supplier name, gender, age, address, date and place of birth, phone number, email address, nationality, occupation/title, name of organization, department, industry, date of agreement, business postal address, business telephone number, business facsimile number, business email address, VAT numbers, tax identification numbers, bank details, bank ownership certificate, language preference, license plate number, driver's license; and
- Supplier CCTV images.

Koole Terminals will not collect Personal Data if such collection is prohibited under the applicable data protection laws. Koole Terminals will maintain Personal Data in a manner that ensures it is accurate, complete and up-to-date.

## **6. Recipients of Personal Data**

In connection with the activities described under Section 4, the Company may need, from time to time, to disclose or make available Personal Data to other companies of the Koole Terminals Group, relevant third party service providers (e.g., customer/supplier relationship management service providers, professional advisers), Company's business partners, regulatory authorities, governmental or quasi-governmental organizations and potential purchasers of the Company or a Company's business. Koole Terminals will only grant access to Personal Data on a need-to-know basis, and such access will be limited to the Personal Data that is necessary to perform the function for which such access is granted. Authorization to access Personal Data will always be linked to the function, so that no authorization will be extended to access Personal Data on a personal basis. Service providers will only receive Personal Data according to the purposes of the service agreement with Koole Terminals.

## **7. International Data Transfers**

International data transfers refer to transfers of Personal Data outside of the EEA and Switzerland. The international footprint of Koole Terminals involves the transfer of Personal Data to other group companies or third parties, which may be located outside the EEA and Switzerland, including the United States. Koole Terminals will ensure that when Personal Data

is transferred to countries that have different standards of data protection, appropriate safeguards to adequately protect the Personal Data are implemented to secure such data transfers in compliance with applicable data protection laws.

#### **8. Retention of Personal Data**

Koole Terminals will not retain your Personal Data processed longer than necessary for the purposes for which it was collected or otherwise Processed as set out in this Notice, and for which Koole Terminals has a valid legal basis. In any case, we will not retain it longer than allowed under statutory local retention periods, i.e., tax or commercial requirements.

In case where Koole Terminals would be involved in any legal claims, we are entitled to continue to Process your Personal Data that is relevant for such claims, subject to applicable local retention requirements.

#### **9. Data Protection Rights**

Under applicable data protection laws, you will benefit from the following rights. You can exercise these rights at any time by contacting the legal department of Koole Terminals (details to be requested from your regular Koole Terminals contact):

- Right to access to, rectification and erasure of Personal Data;
- Right to restriction of Processing;
- Right to object to Processing;
- Right of data portability to the extent applicable;
- Right to withdraw consent where the Processing is based on consent; and
- Right to lodge a complaint with the Supervisory Authority.

#### **10. Implementation**

The present Notice will be applied to and implemented by all the entities of Koole Terminals in Europe in their respective country.

#### **11. Notice Compliance and Contact Information**

Monitoring and ensuring compliance of the Personal Data Processing within Koole Terminals with this Notice and applicable data protection laws is the responsibility of the legal department of Koole Terminals.

#### **12. Miscellaneous**

This Notice may be revised and amended by Koole Terminals from time to time and appropriate notice about any amendments will be given.