

## Data Protection Information for Suppliers and other affected Parties\*

(\* e.g. service providers, bidders in tendering procedures, interested parties)

The following information is intended to inform you about how we process your personal data and what rights you have under data protection law.

### 1. Who is responsible for data processing and who can you contact?

The Hettich company with which you enter into a supplier or business relationship or with which you contact as a (potential) supplier is generally responsible for data processing.

A list of the companies in the Hettich Group and the respective data protection officers, including contact details, can be found in Appendix 1.

### 2. What sources and data do we use?

We process personal data from employees or contact persons of suppliers that we receive in the course of initiating, establishing and conducting a business relationship. This includes title, name, business contact details (e.g. email address, telephone number) and other data that is provided to us by the supplier or arises from the respective context (e.g. position and function at the supplier, power of representation).

In the case of natural person-sole traders, self-employed persons, freelancers or other individuals who act as suppliers or service providers, we also collect and process personal data related to the supplier's business activities, such as bank details, VAT identification number, information on existing or concluded insurance policies and creditworthiness data.

In the case of deliveries and services that are billed on a time and material basis, working hours (duration, date and time), information on business trips (duration, means of transport, hotel, travel expenses) and services provided by individuals may also be collected and processed.

In addition, we process data that is lawfully transmitted to us by credit agencies.

### 3. Why do we process your data (purpose of processing) and on what legal basis?

We process personal data in accordance with the EU General Data Protection Regulation (GDPR) and other applicable data protection regulations.

#### 3.1 To fulfil contractual obligations (Art. 6 (1) (b) GDPR)

We process your personal data to perform our contracts with you, in particular in the context of our order processing and the use of your services. Furthermore, your personal data is processed to carry out measures and activities in the context of pre-contractual relationships.

#### 3.2 To fulfil legal obligations (Art. 6 (1) (c) GDPR)

We process your personal data if this is necessary to fulfil legal obligations, in particular commercial and tax law retention and documentation obligations.

### 3.3 To pursue our legitimate interests (Art. 6 (1) (f) GDPR)

Where necessary, we process your data beyond the actual fulfilment of the contract in order to pursue our legitimate interests, which consist of managing, maintaining and optimising our supply relationships in an efficient, transparent and documented manner. We process your data for the following purposes in particular:

- Checking the creditworthiness of suppliers
- Evaluating suppliers according to economic criteria
- Carrying out audits
- Assertion of claims and defence in court and out-of-court disputes
- Developing and training AI models
- Restricted storage of your data if deletion is not possible or only possible with disproportionate effort due to the special nature of the storage

Note on AI training:

The development and training of AI models takes place in secure environments.

### 3.4 Based on your consent (Art. 6 (1) (a) GDPR)

If you have given us your consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent.

Consent that has been given can be withdrawn at any time. The withdrawal of consent only has effect for the future and does not affect the lawfulness of the data processed until the withdrawal.

## 4. Who receives your data?

We only pass on your personal data to companies within the Hettich Group to the extent necessary to fulfil the purposes specified in section 3.

For these purposes, recipients outside the Hettich Group may also receive your data, in particular

- service providers used by us, e.g. logistics service providers, IT service providers, telecommunications companies, payment service providers, credit information service providers, consulting firms (including solicitors, tax advisors and auditors),
- public authorities and institutions in the event of a legal or official obligation.

In this context, your data may be transferred to recipients in countries outside the EU and the EEC (so-called 'third countries'). However, data will only be transferred to recipients in third countries if the EU Commission has confirmed that the third country has an adequate level of data protection or if other appropriate data protection guarantees (e.g. Binding Corporate Rules or EU standard contractual clauses) are in place.

## 5. How long do we store your data?

We process and store your personal data to the extent and for as long as this is necessary to fulfil contractual or legal obligations. For example, we store your data to comply with commercial or tax law retention and documentation obligations. Furthermore, longer storage may be necessary to preserve evidence within the national limitation period regulations.

Your personal data will only be stored in AI models to the extent and for as long as this is necessary for the development and training of the AI model in question. Once development or training has been completed, the data will be deleted from the AI model.

## **6. To what extent do we use automated decision-making (including profiling)?**

We use automated processing methods (including AI) to optimise and support our internal processes. However, we do not use fully automated decision-making in accordance with Art. 22 GDPR. Should we use these procedures in individual cases, we will inform you separately if this is required by law.

## **7. What data protection rights do you have?**

The applicable data protection law grants you comprehensive rights as a data subject vis-à-vis the controller (see section 1 above) with regard to the processing of your personal data. Every data subject has

- the right to information about the data we have stored about them
- the right to rectification, erasure or restriction of the processing of their personal data
- the right to object to processing (see section 9 below)
- the right to data portability
- the right to lodge a complaint with a data protection supervisory authority

## **8. Are you obliged to provide data?**

Within the scope of our business relationship, you are required to provide the personal data necessary for the establishment, execution and termination of a business relationship and for the fulfilment of the associated contractual obligations, or which we are legally obliged to collect. Without this data, we will generally not be able to conclude, execute or terminate a contract with you.

## **9. Information about your right to object (Art. 21 GDPR)**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your data carried out on the basis of Art. 6 (1) (f) GDPR, including profiling based on this provision. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

You can exercise your right to object using the contact details provided in Appendix 1.

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