

Data Protection Policy Business Partners

How we handle your data and your rights Information on the implementation of the European General Data Protection Regulation (GDPR)

This is a general data protection policy and applies only in those cases where no individual data processing agreement has been formalized and does not apply to applicants for vacancies (see Data Protection Policy Applicants).

Individual data processing agreements are always leading. For inquiries about data processing agreements please contact datasecurity@nedsschroef.com.

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

Responsible for the data processing is
Koninklijke Nedschroef Holding B.V.
Kanaaldijk N.W. 175
7507 Helmond
Email: dataprotection@nedschroef.com
Contact details of the data protection officer:
Email: dataprotection@nedschroef.com

2. What sources and data do we use?

We process data that we receive exclusively from the business relationship with you and that we receive from you directly.

We process the following data:

- Master data for your inquiry/contract
 - o Name
 - o Address
 - o Bank details
 - o Telephone number
 - o E-mail
 - o Tax data
 - o Payment terms

3. For what purposes and on what legal basis is your data processed?

We process your personal data in compliance with the data protection regulations of the EU General Data Protection Regulation (GDPR), and all other relevant legislation.

- To fulfill contractual obligations
We process your data to carry out our contracts with you.
The purposes of data processing are based in detail on the contractual basis.
In some case a data processing agreement is required or already formalized.
- As part of the common interest
In individual cases, we process your data in order to protect our legitimate interests or those of third parties (e.g. authorities). This applies in particular to internal data exchange for administrative purposes or the investigation of criminal offenses.

Department	Identification #	Issue date	Revision	Process owner	Approved	Page
H=Legal	I-011	01-02-2022	00	Group General Counsel	TH	1 of 3
Hardcopy is uncontrolled						

- Based on your consent

If you have given us your consent to the processing of your personal data, the respective consent is the legal basis for the processing mentioned there.

You can revoke your consent at any time. This also applies to consent provided before the GDPR came into force (May 25, 2018). The revocation is effective for continuous processing in the future

4. Who receives and processes your data?

Within our company, only those people and departments, Nedschroef partners and/or authorities who need your personal data to fulfill your request and/or our contractual and legal obligations receive and process it.

The person/department responsible can use service providers and/or third parties to fulfill your request and/or our contractual and legal obligations.

Including but not limited to:

- Logistics and postal service providers
- Advice and consulting
- Debt collection service providers and lawyers
- Credit institutions and providers of payment services
- Authorities
- File and data carrier disposal
- IT service provider
- Cooperation partners
- Etc.

5. How long will your data be stored?

We process your personal data for the duration of our business relationships, which includes the initiation and the execution of a contract.

We will delete your personal data as soon as it is no longer required for the fulfillment of our contractual relationship or your inquiry.

In addition, we are subject to various legal retention and documentation obligations. The standard retention period is ten years, and in specific cases up to thirty years.

6. Will your data be transferred to a third country?

Nedschroef will only transfer your personal data to third countries if required for the fulfillment of our contractual relationship or your inquiry and with your consent.

Typically, this will be the case for all Nedschroef companies outside of the European Economic Area (EEA). At this moment Nedschroef presence outside the EEA is in China and the United States of America,

Your data will be processed by Nedschroef on services provided by service providers with a registered head office outside of the EEA. All of our service providers process personal data only on instruction, within the EEA and are contractually bound accordingly.

Department	Identification #	Issue date	Revision	Process owner	Approved	Page
H=Legal	I-011	01-02-2022	00	Group General Counsel	TH	2 of 3
Hardcopy is uncontrolled						

In some cases, Nedschroef cannot prevent that a service provider with a registered head office outside the EEA is summoned to transmit data to the government. This is applicable to the following service providers:

- Microsoft Corporation (Microsoft365 and other cloud services) with the head office in the United States of America.

With these Service providers are the EU standard contractual clauses the European commission completed.

7. Are you obliged to provide your data?

You are obliged to provide personal data for the execution of an agreement and to fulfil your request. If this data is not provided the agreement and or request cannot be executed by Nedschroef.

8. What data protection rights do you have?

In accordance with the data privacy law, you have the following rights with regards to the processing of your personal data:

- Information about personal data processed
- Correction of information
- Deletion of information
- Blocking, data transfer
- Restriction of processing.
- Publication of data provided to you in a structured, common, and machine-suitable format.
- Withdraw consent and to object to the processing based on legitimate interest
- Lodge a complaint with the supervisory authority

Department	Identification #	Issue date	Revision	Process owner	Approved	Page
H=Legal	I-011	01-02-2022	00	Group General Counsel	TH	3 of 3

Hardcopy is uncontrolled

Data Protection Policy Applicants

Koninklijke Nedschroef Holding B.V. collects and processes the personal data provided by applicant for the purpose of processing of the job applications, the processing will be done in accordance with international and local privacy legislation.

This data is provided by you (the applicant) and the processing only takes place if you have given consent to do so.

If the application results in an employment contract, the provided data will be processed for the purpose of processing the employment relationship in compliance with the statutory provisions.

The application data is only distributed internally to the responsible associates for validation and/or to prepare for interviews.

The application data is transferred to the relevant country, this will only be outside of the European Economic Area (EEA) if the applicant applies for position at an organization that is also located outside of the EEA.

Application data for positions within the EEA will always be processed within the EEA.

You can contact the IT Security risk and compliance officer for data privacy and processing questions and or issues at the following address: datasecurity@nedschroef.com

If the application does not result in an employment contract, the application documents and all related information to the application will be deleted within six months and in accordance with local legislation unless you have provided consent that the data can be stored for a longer period of time.

In accordance with the data privacy law, you have the following rights with regards to the processing of your personal data:

- Correction of information
- Deletion of information
- Blocking, data transfer
- Restriction of processing.
- Publication of data provided to you in a structured, common, and machine-suitable format.
- Withdraw consent and to object to the processing based on legitimate interest
- Lodge a complaint with the supervisory authority

As part of the contract initiation/relationship, you must provide all relevant personal data Provide data for the establishment and implementation of a contractual relationship and the fulfillment of the associated contractual obligations are required or which we are legally obliged to collect.

Note on sensitive data:

In order to process your application Nedschroef is required by law to obtain your personal information, in particular the curriculum vitae, certificates and other and possibly sensitive information like information about intellectual and physical health, racial or ethnic origin, political opinions, religious or philosophical beliefs, union or political party membership, or sex life.

By submitting this data, you agree to the processing of this data by Nedschroef.

Department	Identification #	Issue date	Revision	Process owner	Approved	Page
H-Legal	I-010	01-02-2022	00	Group General Counsel	TH	1 of 1
Hardcopy is uncontrolled						