

## Data protection information for customers, suppliers and service providers

Version 1 dated 25/05/2018

dormakaba UK and Ireland  
Dorma UK  
Wilbury Way  
Hitchin, Hertfordshire  
SG4 0AB

Kaba Ltd  
Lower Moor Way  
Tiverton  
Devon  
EX16 6SS

dormakaba UK and Ireland takes the protection of your personal data very seriously and will only process this data in compliance with the legal data protection regulations. With this data protection information, we would like to provide you with an overview of how we process your personal data and your rights in this regard. Which individual data is processed or used by us depends on your relationship with our company. As a result, some parts of this data protection information may not apply to you.

### **A. Responsible authority and data protection officer**

- a. The following company is responsible for the processing of your personal data

dormakaba UK and Ireland  
Dorma UK  
Wilbury Way  
Hitchin  
Hertfordshire  
SG4 0AB

Kaba Ltd  
Lower Moor Way  
Tiverton  
Devon  
EX16 6SS

- b. Our data protection officer can be contacted at

FAO Data Protection Officer  
dormakaba UK and Ireland  
Dorma UK  
Wilbury Way  
Hitchin  
SG4 0AB

Kaba Ltd  
Lower Moor Way  
Tiverton  
EX16 6SS

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

We process personal data, which we receive from you when you make contact with us. We collect customer data, for example, when you use our online contact form, when you call our free information hotline, or when you send an e-mail to our central contact address with an enquiry.

Suppliers and service providers register in the supplier portal in order to take part in tenders, and to be considered as a contracting partner. Their data is collected on registration.

We obtain the delivery addresses of our contracting partners' customers in order to send our products to the correct location. By these means, we receive data from our contracting partners, who previously acquired it from you directly.

We also process personal data retrieved with your consent from publicly accessible sources (e.g. debtors' list), or transferred to us with your consent by other companies of dormakaba or by other third parties, such as credit agencies.

Relevant personal data includes:

- Personal identification details and contact information (e.g. title, name, address, date of birth, e-mail address and telephone number);
- Payment details (e.g. account details);
- Details for the fulfilment of our contractual obligations (e.g. delivery addresses, addresses of properties with repair orders, invoice data);
- Information about your financial situation (e.g. credit information);
- Details about your online activity and preferences (e.g. IP addresses, identifying features on mobile devices, details about visits to our websites and apps, geolocalisation data);
- Advertising and sales data (e.g. information about granted or withdrawn permissions).

## **C. Purpose and legal basis of data processing**

We process personal data in compliance with the EU General Data Protection Regulation (EU-GDPR) and the Data Protection Act 2018

### ***1.1 for the fulfilment of contractual obligations (article 6 paragraph 1 point b EU-GDPR)***

Data is processed for the purpose of fulfilling the contract with you or for implementing pre-contractual measures that take place on your own initiative.

For example, this applies if you order spare parts, services or products from us.

We will also transfer your address details to logistics companies and sub-contracting traders in order to fulfill our obligations and install/maintain the product. It is also possible that we will receive your address details if you are provided as a contact for installation or maintenance, e.g. by your lessor.

Further details about the purposes of data processing can be found in the relevant contract documentation and terms of business.

### ***1.2 for the purpose of balancing interests (article 6 paragraph 1 point f EU-GDPR)***

Data processing takes place for the purpose of safeguarding our legitimate interests, as well as those of third parties, provided that they are not outweighed by your legitimate interests. Examples:

- Internal procurement market analysis,
- Internal data processing and analysis to guarantee an individual customer approach with tailored offers,
- Internal data processing and analysis for the purpose of improving and developing intelligent and innovative services and products,

- Enforcement of legal claims and defense during legal disputes,
- Prevention and investigation of criminal offences,
- Video surveillance for the safeguarding of domestic authority as well as the collection of evidence for criminal offences,
- Comparison of your data with the sanction and embargo lists of the European Union,
- Keeping of a visitor log for our company premises, incl. recording of name and vehicle registration plate.

### **1.3 based on your consent (article 6 paragraph 1 point a EU-GDPR)**

Provided that you grant your consent for us to process your personal data for certain purposes (e.g. for sales pitches over the telephone, participating in a competition), it is lawful for your data to be processed on this basis. You may withdraw your consent at any time. This also applies to declarations of consent made prior to the validity of the EU-GDPR, i.e. before May 25, 2018. Withdrawals of consent are effective only for the future and do not affect the legality of data processing until the point of withdrawal.

### **1.4 based on legal requirements (article 6 paragraph 1 point c EU-GDPR)**

In order to fulfil commercial and tax requirements, your personal data will be stored for a duration described in further detail below. In accordance with European Union law, we are obligated to take into account embargo and boycott lists when supplying customers, as well as the obligations of suppliers and service providers.

## **D. Recipients of personal data**

Within our company, your data can be accessed by those individuals or offices who require them to perform their respective role in the company, or to fulfill our contractual or legal obligations.

Service providers used by us may also receive your data. These are initially other dormakaba companies, as well as companies including postal and printing services, IT service providers, telecommunications service providers (call centers), sales partners, web service providers, credit agencies, collection agencies and other service providers hired for the fulfillment of orders.

Under certain conditions, personal data may also be transferred to public institutions, e.g. tax authorities, judicial and law enforcement authorities (e.g. police, prosecution offices, courts), lawyers and notaries, as well as accountants.

Specifically, the following recipients may receive your personal data:

- *Marketing*
- *Supply Chain*
- *Accounts*
- *HR*
- *Sales*
- *Service*

## **E. Duration of storage**

We will always delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary.

## **F. Your data protection rights**

You have the following rights to data protection in accordance with the legal provisions:

1. the right to information about the data stored by us (article 15 EU-GDPR) as well as

2. the right to correction (article 16 EU-GDPR),
3. the right to deletion (article 17 EU-GDPR),
4. the right to restrict processing (article 18 EU-GDPR),
5. the right to data portability (article 20 EU-GDPR),
6. and the right to object (article 21 EU-GDPR)

You also have the right to complain to the responsible supervisory authority, Information Commissioner's Office (ICO) data protection officer <https://ico.org.uk/>

## **G. Am I required to provide you with my personal data?**

As part of our business relationship, you must provide the personal data that is required for the initiation, fulfillment and termination of the business relationship and for the fulfillment of the associated contractual obligations, or that we are legally obliged to collect. Without this data, we are generally unable to enter into or fulfil a contract with you.

In our contract forms and on our website, it is clearly marked which information is voluntary and which is compulsory.

## **H. Automated decision-making in individual cases Profiling [1] is the creation, updating and utilisation of profiles [2] by collecting data (including data acquired on the Internet), as well as its subsequent analysis and evaluation for the purpose of identification and monitoring of individuals, as well as for the optimisation and prediction of (direct) marketing, or for the purpose of influencing voting habits, behavior or opinion.**

We acquire credit information about customers and other contracting partners. During this activity, we evaluate whether your credit rating is adequate to enter into a certain contract with you. This decision is partially automated using statistical methods with the aid of information from credit agencies.

We do not use any fully automated decision-making processes for the establishment and fulfillment of business relationships in the sense of article 22 EU-GDPR.

## **I. Profiling**

dormakaba UK and Ireland carries out profiling with the data subject's data within the context of processing activities.

Profiling is the creation, updating and utilisation of profiles by collecting data (including data acquired on the Internet), as well as its subsequent analysis and evaluation for the purpose of identification and monitoring of individuals, as well as for the optimisation and prediction of (direct) marketing, or for the purpose of influencing voting habits, behavior or opinion.

To be able to provide you with targeted information about our products, we sometimes use "profiling". This means that we process your data in order to evaluate certain personal aspects. This enables tailored communication and advertising, including market and opinion research

## **J. Right of objection**

### **1. The right of objection in individual cases**

You have the right to object to the processing of your personal data at any time, for reasons arising from your particular personal situation, if processing takes place on the legal basis outlined in article 6 para. 1 point e EU-GDPR (processing in the public interest) and art. 6 para. 1 point f EU-GDPR (data processing for the purpose of balancing of interests). This also applies to profiling that is supported by this condition.

If you file an objection, we will refrain from processing your personal data, unless we can demonstrate mandatory, legitimate reasons for processing such data that outweigh your

interests, rights and freedoms, or serve the purpose of enforcing, exercising or defending legal claims.

2. **Right of objection to processing of data for the purposes of direct marketing**

In isolated cases, your personal data may be processed for the purposes of direct marketing. You have the right to object to the processing of your personal data for the purpose of this kind of marketing at any time. This also applies to profiling in connection with direct marketing.

3. **Recipient of your objection**

You can send your objection in any format with the subject line "Objection", stating your name, address and date of birth, to: [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com) .