

## **Additional information for employees of suppliers and individual persons as suppliers**

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KEENFINITY (hereinafter 'we' or 'Keenfinity Group') would like to inform you about the categories of personal data we process, for which purposes and to what extent. The data protection notice applies to all processing of personal data carried out by us, both in the context of the provision of our services and on our websites or in mobile applications. The protection of your privacy throughout the course of processing personal data as well as the security of all business data is an important concern to us. We process personal data confidentially and only in accordance with statutory regulations. Data protection and information security are included in our corporate policy.

### **Principles**

Personal data consists of all information related to an identified or identifiable natural person, this includes, e.g., names, addresses, phone numbers, email addresses, contractual master data, contract accounting and payment data, which is an expression of a person's identity.

We process personal data only when there is a statutory legal basis to do so.

### **Controller**

Controller in accordance with Art. 24 GDPR for the processing of your personal data is the legal entity of KEENFINITY Group which is your contract partner. You find our contact information in the contract between you and us.

### **Processing purposes and legal bases**

We, as well as the service providers commissioned by us, process your personal data for the following processing purposes:

- Purpose 1: Fulfilment of contractual obligations. Legal basis for the processing is performance of a contract, Art. 6 (1)(b) GDPR.
- Purpose 2: Risk analyses, screenings against anti-terror and sanctions lists as well as business partner checks. Legal basis for the processing is legal obligation, Art. 6 (1)(c) GDPR, in case the obligation arises from EU laws, or legitimate interest respectively, Art. 6 (1)(f) GDPR. Our legitimate interests are the fulfilment of external legal and regulatory requirements as well as customer requirements.
- Purpose 3: Backup and evaluation of electronic data in the event of security incidents, analysis and correction of errors and technical faults in KEENFINITY's IT systems, or determination of the costs of resources used for the purpose of internal recharging of IT costs. Legal basis for the processing is legitimate interest, Art. 6 (1)(f) GDPR. Our legitimate interest is the protection of our infrastructure.

- Purpose 4: Backup of electronic data for evaluating in case of a violation of our compliance requirements, or in connection with judicial, administrative, and extrajudicial proceedings, or defense against legal claims. Legal basis for the processing is, depending on the constellation, legal obligation, Art. 6 (1)(c) GDPR, or legitimate interest respectively, Art. 6 (1)(f) GDPR. Our legitimate interest is the fulfilment of our compliance requirements.

#### **Transmission of personal data to third parties**

We transfer your personal data to third parties. This personal data includes:

- First name and surname
- Email address
- Job title

The legal basis for the data transfer is our legitimate interest Art. 6 (1)(f) GDPR.

#### **Data transfer to other controllers**

Principally, your personal data is forwarded to other controllers only if required for the fulfillment of a contractual obligation, or if we ourselves, or a third party, have/has a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal basis and the recipients or categories of recipients can be found in the Section "Processing purposes and legal bases".

Additionally, your personal data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

#### **Transfer to recipients outside the European Economic Area (EEA)**

We might transfer personal data to recipients located outside the EEA into so-called third countries. In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection or that you have consented to the transfer. You are entitled to receive an overview of third country recipients and a copy of the specifically agreed provisions securing an appropriate level of data protection. For this purpose, please use the e-mail address listed in the Section "Rights of data subjects, Art. 15-22 GDPR".

#### **Sub-Processing**

We involve external processors (e.g., service provider) with tasks such as conducting screenings. We have chosen those processors carefully and monitor them on a regular basis, especially regarding their diligent handling of and protection of the personal data that they store. All processors are obliged to maintain confidentiality and to comply to the statutory provisions. Processors may also be other KEENFINITY group companies.

**Duration of storage, retention periods**

Principally, we erase your personal data if a purpose and legal basis for data processing does not exist anymore, or we are legally obliged to erase. Please note that we are not allowed to erase personal data, which we must keep to fulfil a legal obligation (e.g., retention periods under the tax and commercial codes, which require the availability of certain documents such as contracts and invoices for a certain period of time).

**Rights of data subjects, Art. 15-22 GDPR**

To exercise your rights or to report data protection incidents, please use the following email address: [dataprotection.keenfinity@keenfinity-group.com](mailto:dataprotection.keenfinity@keenfinity-group.com).

**Right to information and access**

You have the right to obtain confirmation from us about whether your personal data is being processed, and, if this is the case, access to your personal data.

**Right to rectification and erasure**

You have the right to obtain the rectification or completion of inaccurate personal data or erasure of your personal data as far as statutory requirements are fulfilled.

**Right to restriction of processing**

You have the right to demand – as far as statutory requirements are fulfilled – the restriction of the processing of your personal data.

**Data portability**

You are entitled to receive personal data that you have provided to us in a structured, commonly used, and machine-readable format or – if technically feasible – to demand that we transfer those personal data to a third party.

**Objection to data processing based on the legal basis of “legitimate interest”, Art. 6 (1) (f) GDPR**

In addition, you have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your personal data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

**Withdrawal of consent, Art. 7 (3) GDPR**

In case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

**Data Protection Officer**

You may contact our Data Protection Officer at any time using the following contact information:

IT-Security Coach GmbH

Olper Hütte 5b

57462 Olpe

Telephone: +49 276183363100

Email: [info@itsecuritycoach.com](mailto:info@itsecuritycoach.com)

**Right to lodge complaint with supervisory authority, Art. 77 (1) GDPR**

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority which is responsible for your place of residence or your state or to the supervisory authority responsible for us.

This is:

**Data Protection Authority of Bavaria for the Private Sector/**

**Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)**

Promenade 18

91522 Ansbach

**Postal address**

Postfach 1349

91504 Ansbach

Deutschland

**Email**

[poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

**Phone**

Phone: +49 (0) 981 180093-0

Monday to Friday: 08:00 a.m. – 12:00 a.m.

**Telefax**

Telefax: +49 (0) 981 180093-800

**Adjustments to the Data Protection Notice**

We reserve the right to change our security and data protection measures. In such cases, we will adjust our data protection notice accordingly.

Effective date: July 1, 2025