

Privacy Notice for Suppliers

At dormakaba, we respect your personal data. This privacy notice explains how we will use your personal data.

Our contact details

Our head office address is:

dormakaba
Lower Moor Way
Tiverton Business Park
Devon
EX16 6SS

Our UK Data Protection Officer can be contacted at gdpr.GB@dormakaba.com

1. What personal data do we collect about you? How will we use that personal data? What is our legal basis for processing your data?

We need information about our suppliers to contact you and purchase your goods or services.

We need your:

- company name
- trading name
- company registration number
- VAT number
- accounts address
- accounts contact
- other business contacts
- email addresses

The only personal data in the list are the name of the accounts contact, the business contacts and any work email addresses. We will use that information to contact the named individuals and this is a legitimate interest.

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Cookies

When you visit our website, we will only use cookies that are essential for the website to work. We won't use non-essential cookies without your consent.

Marketing

You can also choose to receive marketing from us by signing up to receive it with your email address.

If you unsubscribe from any emails, we will keep your email address in a suppression list for five years so that we don't email you again by accident. This is a legitimate interest for us.

2. Do we use any automated decision making?

We do not use any automated decision making.

3. Who do we share your personal data with?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Entity	Legal basis for sharing
Our professional advisers such as lawyers and accountants	Legitimate interest
Government or regulatory authorities or law enforcement	Legal obligation
Professional indemnity or other relevant insurers	Legitimate interest
Third parties to whom we outsource certain services such as, without limitation, confidential waste disposal, IT systems or software providers, IT support	Legitimate interest

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service providers, document and information storage providers	
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Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide our services as effectively as we can.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal data appropriately and according to our legal and regulatory obligations.

4. Do we transfer your personal data outside of the UK?

We may transfer your collected data to storage outside the UK. It may be processed outside the UK to fulfil your order and to receive our Services and deal with payment.

If we do store or transfer data outside the UK, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the UK GDPR. Such steps may include, but not be limited to, determining adequacy decisions in place, implementing International Data Transfer Assessments, conducting Transfer Risk Assessments and the use of legally binding contractual terms between us and any third parties we engage with.

If you would like further details on 3rd parties and data processors we use, please contact us and we will be happy to provide further information to you.

5. How long do we keep your personal data for?

We will hold your data for seven years for HMRC purposes, if you have purchased an item from us.

We will keep your email in our marketing database until you unsubscribe or haven't opened an email from us for one year. Then we will move your email to our suppression database.

6. How we protect your information

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We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal data which is collected, recorded, or processed in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection responsibilities.

Your data is protected by controls designed to minimise loss or damage through accident, negligence, or deliberate actions. Our employees are trained to protect sensitive or confidential information when storing or transmitting data in any medium including electronically and must undertake annual refresher exercises on this.

7. How to access your information and your other rights

You have the following rights in relation to the personal data we hold about you:

- **Your right of access**
If you ask us, we'll confirm whether we're processing your personal data and, if necessary, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Your right to rectification**
If the personal data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to erasure**
You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal data with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to restrict processing**
You can ask us to 'block' or suppress the processing of your personal

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data in certain circumstances, such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

- **Your right to data portability**

You have the right, in certain circumstances, to obtain personal data you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- **Your right to object**

You can ask us to stop processing your personal data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal data for direct marketing purposes.

- **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.

- **Your right to lodge a complaint with the Information Commissioner's Office**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal data, you can report it to the ICO. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due.

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The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Fax: 01625 524510

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Updates to policy:

Review Date	Changes or Modifications	Approved by	Published

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