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Vendor Privacy Notice

Status: 1 April 2020

Rabobank Frankfurt, a branch of Coöperatieve Rabobank U.A., e-mail: datenschutz@rabobank.com ("we" or "our") provides this vendor privacy notice ("privacy notice") to explain our practices as data controller with respect to personal data relating to our service providers, suppliers and other business partners (collectively, "vendors") and the employees of our vendors.

1 Scope of applicability:

This privacy notice applies to you if you are an individual (e.g. consultant or sole proprietor) who is a vendor of Rabobank Frankfurt or if you are an employee of a vendor who interacts with us on behalf of that vendor.

2 Categories of personal data:

Rabobank Frankfurt processes the following categories of personal data about you as Rabobank Frankfurt has received the following personal data from you or authorized third parties (e.g. superiors, government agencies or public sources):

- Personal data from vendors who are individuals: Name, business address, commercial register information, services or products provided or offered, contact data, communication content (such as e-mail or business letters), payment information, billing information and previous business relationships
- Personal data of an employee of a vendor: name, business address, commercial register information, contact data, name of the

employer, function/position, communication contents (such as e-mail or business letters)

3 Processing purpose, legal bases and impacts:

Your personal data will be processed for the purpose of fulfilling the contractual relationship with the vendor (including the fulfilment of contractual obligations, invoice processing, communication, legal and compliance activities), for marketing and CRM activities and for security and anti-fraud measures. Rabobank Frankfurt relies on the following legal bases for these processing activities:

- Fulfilment of the contractual relationship with the vendor (Art. 6 para. 1 lit. b GDPR);
- Legitimate interest of Rabobank Frankfurt, the group companies of Rabobank Frankfurt or other third parties (such as government agencies or courts) (Art. 6 para. 1 lit. f GDPR). The legitimate interest may in particular include the group-wide exchange of information, marketing and CRM activities, the prevention of fraud, misuse of IT systems or money laundering, the operation of a whistleblowing system, physical security, IT and network security, internal investigations or potential merger and acquisition activities (further information on the weighing of interests is available on request);
- Consent (Art. 6 para. 1 lit. a GDPR);
- Fulfilment of legal obligations (Art. 6 para. 1 lit. c GDPR).

The provision of personal data is necessary for the conclusion and/or performance of the contract

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with the vendor and is voluntary. However, if you do not provide the personal data, this may result in a delay or impossibility of carrying out the relevant processes with the vendor or of dealing with the vendor.

4 Categories of recipients:

Rabobank Frankfurt may commission service providers who act as processors to provide IT and other administrative support (e.g. service providers who offer paid support or IT hosting and maintenance support). These service providers may have access to your personal data to the extent necessary to provide these services.

In addition, Rabobank Frankfurt may transfer your personal data to our parent company, Coöperatieve Rabobank U.A., in the Netherlands, to assist its subsidiaries as processors in the operation of information systems and related general IT support.

Any access to your personal data is limited to those persons who need to know the personal data to perform their tasks.

We may also disclose your personal data to governmental authorities, courts, external consultants and similar third parties where required or permitted by law.

5 Retention period:

In accordance with applicable data protection laws, we and/or our service providers will not store your data for longer than we need to fulfill our obligations and only for the time necessary to achieve the respective processing purposes.

If we no longer need your personal data to comply with contractual or legal obligations, we will delete it from our systems or make it anonymous

accordingly, so that it cannot be identified, unless we need to retain information, including your personal data, to comply with legal or regulatory obligations to which Rabobank Frankfurt is subject, e.g. statutory retention periods which may result from please insert, e.g. the German Commercial Code (HGB) or the German Fiscal Code (AO), and which generally last 6 to 10 years, or if we have to secure evidence during the statutory limitation periods, which generally last 3 years but can be up to 30 years.

6 Automated decision making:

We do not carry out any automated decision making within the framework of the business relationship.

7 Your rights:

If you have consented to the processing of your personal data, you can revoke your consent at any time with effect for the future. Such revocation does not affect the lawfulness of the processing carried out on the basis of the consent until revocation.

According to the applicable data protection laws you may be entitled to the following rights: Right of access to personal data, right of rectification of personal data, right of deletion of personal data, right to limit the processing of personal data, right of data transferability, right to object to the processing of personal data. Please note that the above rights may be limited by national law.

(a) Right of access:

You may have the right to obtain confirmation as to whether personal data relating to you is being processed and, if so, the right to access such personal data. The right of access shall include, inter alia, the purposes of the processing, the categories of



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personal data being processed and the recipients or categories of recipients to whom the personal data are disclosed. However, this right is not unlimited, as the rights of others may limit your right of access. The right to information is restricted by Section 34 of the Federal Data Protection Act (BDSG), e.g. if the data (a) is stored only because it may not be deleted due to legal or statutory storage regulations, or (b) is used exclusively for purposes of data backup or data protection control, and the provision of information would require a disproportionate effort, and if processing for other purposes is excluded by appropriate technical and organizational measures.

You may have the right to receive a copy of the personal data processed by us. For further copies requested by you, we may charge a reasonable fee calculated on the basis of the administrative costs.

(b) Right of rectification:

You may have the right to request that incorrect personal data relating to you will be corrected. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

(c) Right of deletion ("right to be forgotten"):

Under certain conditions, you have the right to ask us to delete personal data concerning you and we may be obliged to delete such personal data. The right to deletion does not exist, e.g. according to § 35 Federal Data Protection Act (BDSG), if deletion is not possible or only possible with disproportionately high effort in the case of

non-automated data processing due to the special type of storage and if the interest of the data subject in deletion can be regarded as low. In this case, deletion is replaced by the restriction of processing.

(d) Right to restrict processing:

Under certain conditions, you have the right to request us to restrict the processing of your personal data. In this case, the relevant data will be marked and processed by us only for specific purposes.

(e) Right to transfer data:

Under certain conditions, you have the right to obtain the personal data concerning you that you have provided to us in a structured, common and machine-readable format and you have the right to transfer such data to another controller without hindrance from us.

You also have the right to file a complaint with a data protection authority. To exercise your rights, you can contact us using the contact details set out in point 8 below.

Right of objection:

Under certain circumstances you have the right to object to our processing of your personal data at any time for reasons arising from your particular situation and we may be obliged to stop processing your personal data.

If personal data is processed for the purpose of direct marketing, you also have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing. This also applies to profiling, insofar as it is related to direct marketing. In this case,



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we will no longer process your personal data for these purposes.

8 Questions:

If you have any questions about this privacy policy or your rights, please contact us at datenschutz@rabobank.com or our data protection officer:

DPO Service GmbH

Bethmannstraße 50-54

60311 Frankfurt am Main

E-Mail: datenschutz@DPOservice.de