



## PROCESSING OF OUR CUSTOMERS' AND SUPPLIERS' PERSONAL DATA

Trelleborg Marine Systems Denmark A/S, Sommervej 31B, 8210 Aarhus V, CVR nr. 34452458 (hereinafter "**TMS**", "**we**" or "**us**") processes personal data about our customers and suppliers (or contact persons at such) (hereinafter referred to as "**you**"). We will always process your personal data in a safe and confidential manner in accordance with applicable data protection legislation, and we have implemented appropriate measures to protect the data against the risks involved in the processing.

If you have any questions in relation to the processing of your personal data, if you want to exercise your rights as described below or if you want to complain or object to our processing then please do not hesitate to contact the responsible for TMS' data protection policies at [toc.aar.gdpr@trelleborg.com](mailto:toc.aar.gdpr@trelleborg.com).

The policy is split into two parts describing our processing of personal data about our customers and about our suppliers, respectively.

### 1. CUSTOMERS

#### 1.1 Purpose, types of personal data and legal basis for processing

TMS processes *ordinary personal data* about you such as *contact details* for the purpose of

- registering customers in our IT-systems;
- invoicing and bookkeeping;
- carrying out deliveries;
- customer service and support;
- customer care;
- day-to-day communications;
- handling claims;
- marketing our products and services;
- coordinating and allocating customers internally with other Trelleborg group companies; and
- optimisation of sales and marketing activities.

The personal data will normally be provided by you, e.g. by telephone or electronically by email in connection with the correspondence between you and TMS.

The processing is based on:

- **Legitimate interests**, when carrying out registering customers in IT-systems, invoicing and bookkeeping, deliveries, customer service and support, customer care, day-to-day communications, marketing TMS' products and services, coordinating and allocating customers internally with other Trelleborg group companies and optimisation of sales and marketing activities (including tracking of customers visiting Trelleborg's website and sending out newsletters).
- **Performance of contract**, when carrying out registering customers in IT-systems, invoicing and bookkeeping, deliveries and customer service and support in relation to customers established in *sole proprietorships* or *smaller partnerships*.

- **Legal obligation**, when carrying out bookkeeping activities, including storage of relevant material according to the Danish Bookkeeping Act, and handling claims.

TMS **transfers ordinary personal data** in customer relationships based on:

- **Legitimate interests** in disclosing the necessary address information to external carriers for carrying out deliveries, disclosing address information to suppliers when delivery is carried out directly from supplier to customer and in order to coordinate customers and markets internally between other Trelleborg group companies.
- **Performance of contract** to the extent the address information disclosed to either external carriers or suppliers regards sole proprietorships or smaller partnerships where the address is personal data about the customer.

## 1.2 Storage period

In general, your personal data will be stored as long as they are relevant for a potential, existing or former business relationship with you.

Personal data contained in correspondence and inquiries will be stored for up to 3 years after the last date of contact, unless a longer storage period is necessary, e.g. if any warranties are still in force, obligations to deliver spare parts or updates to software or if necessary for any ongoing or potential complaints proceedings, disputes or claims for defects pending between you and TMS.

Personal data which must be stored under the Danish Bookkeeping Act or other accounting rules will be deleted 5 years after the end of the relevant financial year.

Personal data contained in backup copies will be deleted by routine overwriting and cannot be accessed in the usual manner.

## 1.3 Recipients

Your personal data will be accessible only to relevant TMS employees.

The data will be disclosed only to the persons who need them for the purposes stated above or where disclosure is required by law. TMS may, if relevant for a particular order or purchase, transfer your contact information to other TMS companies, e.g. if a product or service in whole or in part are to be delivered by other Trelleborg group companies, and to third parties, e.g. carriers for carrying out deliveries.

Once every week, we share our weekly order intake with other companies in the Trelleborg group in order to coordinate customers and regional markets internally between other Trelleborg group companies. Only company name is shared in this regard.

We have engaged data processors to process data on our behalf that will get access to your personal data according to our specific instructions.

## 2. SUPPLIERS

### 2.1 Purpose, types of personal data and legal basis for processing

TMS processes ordinary personal data about you such as *contact details* for the purpose of

- establishing new supplier relationships and maintaining current;
- invoicing and bookkeeping; and
- handling claims.

The personal data will normally be provided by you, e.g. by telephone or electronically by email in connection with the correspondence between you and TMS.

The processing is based on:

- **Legitimate interests**, when carrying out registering suppliers in IT-systems, placing orders and handling invoices and establishing new supplier relationships and maintaining current.
- **Performance of contract**, when carrying out registering suppliers in IT-systems, placing orders and handling invoices in relation to suppliers established in *sole proprietorships* or *smaller partnerships*.
- **Legal obligation**, when carrying out bookkeeping activities, including storage of relevant material according to the Danish Bookkeeping Act, and handling claims.

TMS **transfers ordinary personal data** about its suppliers to other Trelleborg group companies based on TMS' **legitimate interests** in maintaining a common library of suppliers within the Trelleborg group.

### 2.2 Storage period

In general, your personal data will be stored as long as they are relevant for a potential, existing or former business relationship with you.

Personal data contained in correspondence and inquiries will be stored for up to 3 years after the last date of contact, unless a longer storage period is necessary, e.g. if any warranties are still in force or due to any ongoing or potential complaints proceedings, disputes or claims for defects pending between you and TMS.

Personal data which must be stored under the Danish Bookkeeping Act or other accounting rules will be deleted 5 years after the end of the relevant financial year.

Personal data contained in backup copies will be deleted by routine overwriting and cannot be accessed in the usual manner.

### 2.3 Recipients

Your personal data will be accessible only to relevant TMS employees.

The data will be disclosed only to the persons who need them for the purposes stated above or where disclosure is required by law.

Within the Trelleborg group, we continually share contact details on our suppliers (including contact persons at such) between our group companies in order to maintain a common library of suppliers within the Trelleborg group.

We have engaged data processors to process data on our behalf that will get access to your personal data according to our specific instructions.

### **3. GENERAL**

#### **3.1 Updating your personal data**

We always seek to ensure that your personal data are accurate and updated. In case of changes to your personal data, we kindly ask you to let us know by using the above contact details. If you inform us of any inaccuracies in your personal data, or if we notice such inaccuracies, we will have them rectified or deleted as soon as possible.

#### **3.2 Your rights under the data protection legislation**

As a data subject you have a number of rights which you may exercise by contacting us, using the above contact details.

You have the right to request information about which personal data we process and to receive a copy of the data. You also have the right to object to our processing of your personal data and to request rectification or erasure of any data which you believe are incorrect, outdated, etc. Further, you may request a restriction of the processing of your personal data. For some of these rights, e.g. the right to erasure, exercising them requires satisfaction of certain concrete conditions set by data protection legislation.

#### **3.3 Complaints**

If you disagree with the way in which we process your personal data, you may file a complaint, using the above contact details. If you disagree with a decision made in any complaint proceedings (or do not wish to complain directly to us), you may also file a complaint with the Danish Data Protection Agency, through the following contact information:

Danish Data Protection Agency (Datatilsynet)  
Carl Jacobsens Vej 35,  
2500 Valby, Denmark  
Phone: +45 33 19 32 00  
E-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
Website: [www.datatilsynet.dk](http://www.datatilsynet.dk)

#### **3.4 Amendments**

This document will be updated on a regular basis and when necessary due to changes of applicable law and practice. As such, we recommend that you regularly keep yourself updated on this document.