

**Information on the processing of personal data *
within supplier management and order processing**



Designation	Description
Identity and contact details of the controller	Phoenix Contact S.p.A. Via Bellini 39/41 20095 Cusano Milanino (MI) Tel. 02.660591 info_it@phoenixcontact.com
Contact details of the data protection officer	Phoenix Contact S.p.A. Via Bellini 39/41 20095 Cusano Milanino (MI) Tel. 02.660591 info_it@phoenixcontact.com
The purposes of the processing for which the personal data are intended	The process and the use of the personal data are intended to cover the demands regarding externally procured materials, investments and services. Selection of optimal sources of supply, reduction of procurement risk, quality assurance, minimization of default risks (supplier, goods). Ensuring the production capability of the company.
Legal basis for the processing	Art. 6 (1) (b) (required to fulfill an agreement or to initiate an agreement) Art. 6 (1) (f) GDPR (legitimate interests) Legitimate interests of the controller and consideration regarding the rights of personality of the data subjects: For legitimate interests, see "Purposes of the processing" above. Phoenix Contact suppliers are exclusively legal persons, or persons who are involved in business transactions, about whom information is collected or who are evaluated within the company.
Categories of personal data that are processed	Name, title, business address, additional addresses, business contact details (telephone number, fax number, e-mail address), form of address, department and function in the company, bank details, control data, VAT ID number. Result of the assessment: 1) Assessment results obtained: Credit rating/risk index, shareholder structure based on various basic data, audit report. 2) Various own key figures such as: ABC classification, supplier profile, evaluation number; free text (risk report). System data from the ERP (for ordering, goods receipt, quality data).
Source (origin) of the data	From the data subject From credit reporting agencies Information collected from our own databases.

*) in accordance with Article 13 and 14 EU General Data Protection Regulation (GDPR)

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Recipient(categories) of the data	<p>Companies of the Phoenix Contact Group.</p> <p>Companies that provide contracted services on our behalf and for defined purposes.</p>
Transfer of data to a third country or an international organization and the associated safeguards to protect the data	<p>Within an intragroup, cross-company supplier management, data from suppliers are also made available to Phoenix Contact companies worldwide if required.</p> <p>To protect the data, there is an international Phoenix Contact data protection framework agreement on the basis of EU standard contractual clauses, which was joined by all relevant Phoenix Contact companies worldwide.</p>
Storage duration of the data	<p>Master data of a supplier are stored in the system as long as there is a contractual relationship or a contractual relationship cannot be ruled out for the future.</p> <p>Furthermore, these data are immediately changed or blocked/deleted if the supplier/contact person as a natural person so requires, or if the responsible purchaser becomes aware of incorrect data. (in each case subject to statutory retention periods).</p> <p>Procurement documents are deleted after expiry of the statutory retention period (10 years) and upon completion of the tax audit.</p> <p>Own audit reports on quality are stored up to 10 years for a long-term supplier development and for the quality proof in customer audits.</p> <p>Creditworthiness information is stored 6 years for the evaluation of the medium-term development of a supplier.</p>
Rights of the data subjects <ul style="list-style-type: none"> • to access • to rectification, erasure or restriction of processing • to object to the processing • to data portability 	<p>If the respective legal requirements are met, you are entitled to the following rights: Right to have access to your data that we store; rectification, erasure, restriction of processing your data or the right to object to the processing, as well as data portability.</p>
Right to lodge a complaint	<p>If you are of the opinion that the processing of your personal data is unlawful, you have the right to lodge a complaint with a competent data protection supervisory authority.</p>
Legal or contractual necessity to provide the data, as well as any consequences of failure to provide the data	<p>The processing of the personal data mentioned here is necessary for the supplier management or the handling of business transactions.</p> <p>Without these data, we cannot enter into a business relationship.</p>
Automated decision-making / Profiling	<p>There will be no automated decision-making or profiling based on your collected data.</p>

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Updated: May 2018

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