

Colt's Privacy Notice for Vendors

1. What does this Privacy Notice cover?

The present privacy notice **informs** to Colt's vendors and contractors, ("**Vendor**", or "**you**") , how **Colt Technology Services** and [Colt Group of companies](#) ("**Colt**" or "**Colt group**") collect and handle their personal data in the context of engaging with vendors, ("**Vendor Privacy Notice**").

The Vendor Privacy Notice describe: (i) how Colt use the Vendor's personal data ("Personal Data"), (ii) Colt's privacy practices in relation to the use of vendor's and vendor's staff personal data and (iii) their personal data protection rights.

Colt's Vendor Privacy Notice applies to **all contracts that Colt enters with vendors**, to all tools and websites made available by Colt for that purpose and to all other ancillary activities related to the service contract. In addition, it supplements to any specific local data protection requirements, and/or local privacy notices that may be posted on our websites, as well as provisions that may be included in our contracts or that may be notified to you from time to time.

Colt is committed to providing with the **highest standards of Data Protection**, thus your personal data will be treated in line with applicable data protection laws, including without limitation, the Regulation (EU) 2016/679 (General Data Protection Regulation – EU GDPR) and the UK GDPR.

2. What type of Vendor's Personal Data does Colt process, why and what for?

Colt only collects and processes Vendor's Personal Data when Colt has a legal basis and the personal data is necessary for a legitimate purpose.

In accordance to the terms and conditions of the services that the vendor is providing to Colt, Colt will receive Personal Data, as detailed below, for executing the service provided to Colt and to remain aligned with Colt's policies and privacy regulatory requirements (the "**Purpose**"). For example and without limitation, as follows:

| what personal data? | legal basis | What Purpose for? |
|--|--------------------------------|--|
| name and contact: name, address and contact details, including email address and telephone/mobile/fax numbers, emergency information job/professional details: title, position, academic or professional certifications | execution of a contract | to comply with Colt's obligations related to the services agreement (before, during and after the relationship) and ancillary agreements such as the data processing agreements, including for contacting purposes, for evaluating your compliance standards, for services delivery and billing purposes, among others. |

Financial Information: Tax/VAT number, bank account, social security number, national insurance number, intermediary's name, intermediary's company registration number

legal obligation to comply with Colt's **obligations** derived from legal, regulatory, tax, labor, social security, health and safety laws

online account/log-in details: username, password, credentials

Colt's legitimate interest for the sign-in and allowing you to use systems or tools provided by Colt or Colt's vendors for executing the contract

Automate obtained details and other voluntary data provided: data obtained from cookies use, user navigation patrons, systems use, survey's input

Individual consent To track the use of our websites, systems, tools and services, to conduct informational activities and to perform business analytics, surveys or market research

3. Access of Colt's Vendor Personal Data

Colt restricts access to Vendor's Personal Data to those Colt's employees who need to know that information within the purposes detailed in the present Privacy Notice.

Colt group companies: The access to the Vendor's Personal Data may be globally thorough all Colt entities. Depending on the services that you are providing for Colt and the country of the services in scope, you may be accessed from any entity that belongs to the Colt group, including countries that are located outside of the EEA. The transfer of such Personal Data is covered by Colt's Binding Corporate Rules.

Colt has been awarded [Binding Corporate Rules \('BCRs'\)](#) certification for both controller and processor. Colt's BCR Controller and Processor decisions are published at the [European Data Protection Board \('EDPB'\) website](#) and at the [Spanish Data Protection Authority \('AEPD'\) website](#). BCRs are a certification granted by the EDPB, the collective body of all European Union ('EU') Data Protection Authorities. Through the BCRs, the EDPB certify that the privacy program implemented by a company is compliant with the GDPR and the same level of data protection compliance valid in Europe is applied all over the entities of the same group. In addition, the BCRs are a tool for safely transfer personal data outside the EU within a group of companies.

Third-parties: Colt will share your Personal Data with third party services providers, customers and partners that will process your Personal Data on Colt's behalf due to business justification or commercial relationship.

Some of them may be located outside of the EEA, appropriate safeguards has been taken to safely transfer such personal data.

The primary recipients are the following ones, who will act as data processors or sub-processors:

| Subcontractor | Headquarter | Purpose | Location | Privacy Policy |
|--|---|---|--|---|
| SAP & its affiliates Ariba | 3420 Hillview Avenue, Building 3, Palo Alto, CA 94304 United States | Cloud services for procurement management services | Data Centers located in the USA | Data Protection and Privacy SAP Trust Center SAP Privacy Statement |
| SAP Fieldglass & or an entity in the SAP Group's | 111 North Canal Street Suite 600 Chicago, Illinois, 60606 | Cloud services for procurement management services and external workforce | USA and any other country where doing business | Data Protection and Privacy SAP Trust Center |

| | | | | |
|---|--|--|--|--|
| | United States | management programs with vendors | | SAP Privacy Statement |
| ServiceNow & its subsidiaries and affiliates | 2225 Lawson Lane, Santa Clara, CA 95054, Delaware, United States | Vendor Risk Management tool for assisting vendors on boarding and due diligence process | USA and any other country where doing business | Privacy and Data Protection - ServiceNow |

4. How does Colt protect personal data?

Colt is processing your personal data in accordance with the below **principles**:

- Your personal data will be processed fairly and lawfully
- Your personal data will be collected for explicit and legitimate purposes and used accordingly
- Your personal data will be relevant and not excessive in relation to the purpose for which it is processed
- Your personal must be accurate and when necessary, kept up to date
- Colt provides you with reasonable measures for you to rectify, erase or block incorrect data about you (see details below)
- Your personal data will be kept no longer than necessary

Colt has achieved [ISO 27701:2019](#), an extension of ISO/IEC 27001 and ISO/IEC 27002 for Privacy and Personal Data. This **Global standard** provides the framework for organizations looking to put in place a system to support compliance with the EU's GDPR, California's CCPA, and other data privacy requirements. ISO 27701, also referenced as PIMS (Privacy Information Management System), outlines a framework for Personally Identifiable Information (PII) Controllers and PII Processors to manage data privacy.

5. For how long does Colt keep personal data?

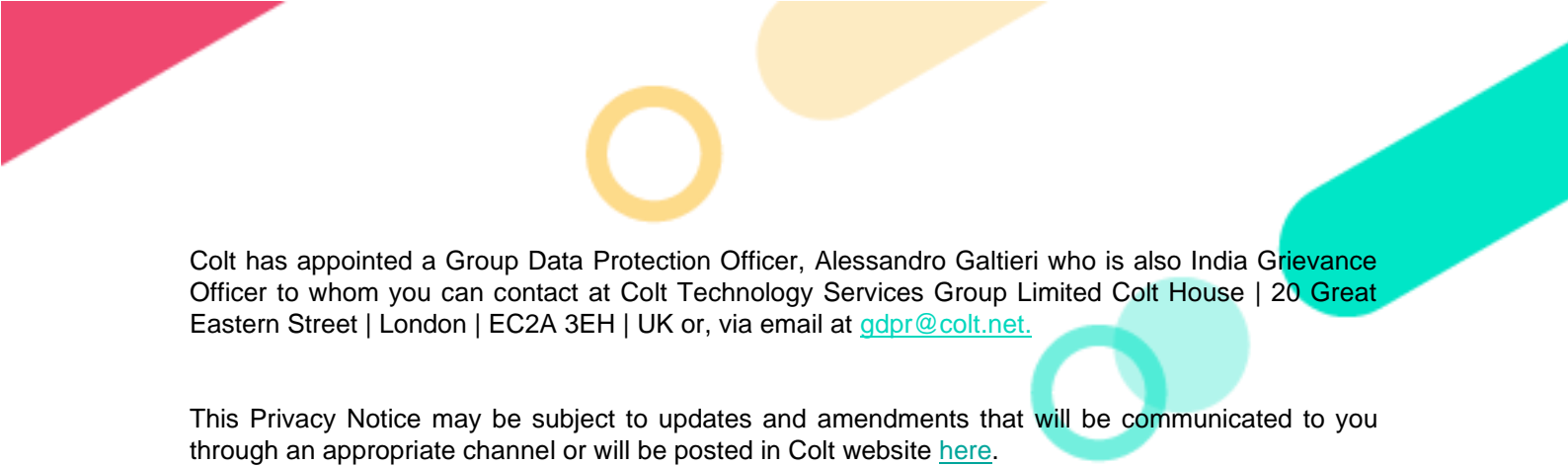
Colt will hold your personal data for the negotiation and duration of the **services agreement or commercial relationship** and, after termination, your personal data will only be retained for as long as it is required by or to meet a Colt's legitimate interest or a Colt's legal obligation. Colt will not use the Personal Data that is collected for any other reason than the reasons stated in this privacy policy.

6. How can you exercise your Data Protection Rights?

You can **exercise your rights** of access, rectification, erasure, restriction, portability or objection regarding the profiling of Personal Data, by using any of the forms related to the right you wish to exercise available at [Data Privacy Information - Colt Technology Services](#) with an identification documentation by email to: Procurementhelpdesk@Colt.net.

According to the GDPR regulation, you are able to **lodge a complaint** to the competent data protection authority. We take our obligations seriously, so if you have any questions or concerns, Colt encourage you to raise them with us first, so that we can try to resolve them, for such purpose please send an email to gdpr@colt.net and DPO@Colt.net.

7. Colt Data Protection Officer and Contact details



Colt has appointed a Group Data Protection Officer, Alessandro Galtieri who is also India Grievance Officer to whom you can contact at Colt Technology Services Group Limited Colt House | 20 Great Eastern Street | London | EC2A 3EH | UK or, via email at gdp@colt.net.

This Privacy Notice may be subject to updates and amendments that will be communicated to you through an appropriate channel or will be posted in Colt website [here](#).

This Privacy Notice was last updated in May 2024.