

## **BUSINESS PARTNER DATA PROTECTION NOTICE**

INDEX Construction Systems and Products S.p.A. ("INDEX SPA") provides this Business Partner Data Protection Notice ("**Notice**") to explain our practices as the Controller regarding the processing of personal data relating to our vendors, customers, suppliers, and other business partners (collectively, "**Business Partners**") and our Business Partners' employees.

### **1. Scope:**

This Notice applies to you if you are

- a Business Partner of INDEX SPA as an individual (e.g., a consultant or sole entrepreneur) or
- an employee of a Business Partner who interacts with INDEX SPA on such Business Partner's behalf.

### **2. Categories of Personal Data and Source:**

INDEX SPA processes the following categories of personal data about you, INDEX SPA has obtained from you or from authorized third parties (e.g., your supervisor, public authorities or public resources):

- **Personal data relating to Business Partners who are individuals:**
  - Name,
  - Business contact details (email, telephone and mobile),
  - Content of communication (such as email or business letters),
  - Payment and/or invoice information.
- **Personal data relating to an employee of a Business Partner:**
  - Name,
  - Business contact details,
  - Employer name,
  - Job title/position,
  - Content of communication (such as email or business letters).

INDEX SPA does not collect any non-business-related data nor any sensitive personal data from its Business Partners.

### **3. Processing Purposes, Legal Basis, and Consequences:**

Your personal data is processed for purposes of

- performing the contractual relationship with the Business Partner (including fulfilling contractual obligations, invoice processing, communication, and legal and compliance activities),
- (direct) marketing activities and/or
- security and fraud prevention activities.

INDEX SPA relies on the following legal bases for such processing activities:

- performance of the contractual relationship with the Business Partner;
- legitimate interest of INDEX SPA, Sika's affiliates or other third parties (such as governmental bodies or courts). The legitimate interest could be in particular group-wide information sharing, (direct) marketing activities, prevention of fraud or misuse of IT systems, physical security, IT and network security, internal investigations, or potential merger and acquisition activities;
- compliance with legal obligations;
- consent, when the above legal bases do not apply.

The provision of personal data is necessary for the conclusion and/or performance of the Business Partner contract, and is voluntary. However, if you do not provide the personal data, the affected Business Partner management and administration processes might be delayed or impossible.

### **4. Categories of Recipients:**

Any access to your personal data is restricted to those individuals that have a need to know in order to fulfill their job responsibilities and data processors, as below identified.

To the extent necessary, INDEX SPA may share your Personal Data within the Sika Group companies, for internal administrative and for marketing purposes.

INDEX SPA may engage service providers, acting as processors, in order to provide IT and other administrative support (e.g., service providers who provide account payable support or IT hosting and maintenance support). Those service providers act as data processors of the Company and under the instructions of the same; they may have access to your personal data to the extent necessary to provide such services.

INDEX SPA may also disclose your personal data as required or permitted by applicable law to governmental authorities, courts, external advisors, and similar third parties.

The updated list of data processors and third parties that we share data with is available upon request to the Company and the DPO at the contact details below specified.

**5. Retention Period:**

Your personal data is stored by INDEX SPA and/or our service providers, to the extent necessary for the performance of our obligations and for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When INDEX SPA no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly pseudonomize/anonymize it, so that you can no longer be identified, unless we need to keep your personal data, to comply with legal or regulatory obligations to which INDEX SPA is subject, e.g. statutory retention periods.

**6. Automated Decision-Making**

Company does not engage in automated decision-making in the context of its Business Partners relationship.

**7. Your Rights:**

You may request access to the information INDEX SPA has about you. You may also request the correction, amendment, or deletion of any information about you that is inaccurate, and you may also request to object anytime to the processing of personal data concerning you for marketing purpose and opt-out of the newsletters.

The request can be addressed to the Company by using the specific web-form “Exercise your rights” available on the Company’s website or using the contact details below.

INDEX SPA will treat requests for access, correction, amendment, or deletion of information in accordance with its internal policies and applicable legal requirements. If you feel that we have not complied with your requests, you have the right to lodge a complaint with the appropriate supervisory authority in your country.

If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

**8. Information Security**

INDEX SPA maintains suitable safeguards, including reasonable physical, organizational and technical security measures to protect its databases from unauthorized access, disclosure, alteration or destruction.

**9. Changes to This Privacy Notice**

INDEX SPA reserves the right to change this privacy notice and will provide a revised privacy notice that reflects such changes as required by law.

**10. Questions:**

If you have any questions about this Notice or your rights, please contact:

INDEX Construction Systems and Products S.p.A.

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Our Data Protection Officer can be contacted at:

email: [privacy.index@it.sika.com](mailto:privacy.index@it.sika.com)