

sqli

Privacy Notice Suppliers and Providers

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SQLI ("SQLI") considers that the protection of your personal data and the respect of your privacy are key issues to which it intends to pay particular attention.

This privacy notice (hereinafter the "**Notice**") is intended to inform you about the processing activities carried out by SQLI when you act on our behalf as a supplier or provider (e.g. employee, trainee, corporate officer, etc.) ("**you**" or the "**Data Subject(s)**").

SQLI Belgium NV, whose registered office is at Lambroekstraat 5c B 1831 Diegem (Belgium) registered under number BE0477.813.387, is responsible for processing your personal data (hereinafter referred to as "**we**", "**us**", "**our**").

1 What personal data do we collect?

In the context of your relationship with SQLI, we process the following categories of personal data:

- **identification data:** your title, surname, first name, contact details, address, internal processing code allowing identification of the service provider, accounting identification code, your image, if applicable, as part of the surveillance system present on our premises; and
- **data relating to your professional life:** position held, identity of your employer.

Generally, the communication of your personal data is compulsory, without which we would not be able to formalize and properly manage our relationship with the entity on whose behalf you are acting. For example, if you refuse to provide us with your contact details so that we can send you a contract for signature, we will not be able to enter into a contract with the entity on whose behalf you are acting.

In any case, we will inform you when the communication of your personal data is compulsory.

Such data will only be processed to the strict extent legally permitted and necessary to the exclusion of any other incompatible purpose. Specific measures will be taken to ensure that the processing of such data remains limited to the strict minimum.

Furthermore, if you are required to communicate personal data of third parties to us, you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this Notice and, where required, have consented to the processing of their personal data.

2 How do we collect your personal data?

SQLI collects your personal data in the following ways:

- **directly from you;** or
- **on the corporate website of the entity you work for,** or
- **other public sources** such as open professional networks like LinkedIn.

3 Why do we use your personal data?

The table below details the purposes for which SQLI processes your personal data and, for each of them, the legal basis for the processing in question:

PURPOSE	LEGAL BASES	CATEGORIES OF PERSONAL DATA
Management of the relationships with the providers, including: (i) preparation and execution of contracts; (ii) management and follow-up of orders placed with us; and (iii) payment of invoices.	The processing is necessary for the performance of the contract concluded with the entity for which you are acting.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.
Compliance assessment of the providers.	The processing is carried out by virtue of our legitimate interest, which consists of evaluating the guarantees offered by our service providers, particularly in terms of security.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.
Compliance with our legal and regulatory obligations.	The processing is necessary to comply with the legal and regulatory obligations to which we are subject.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.
Management and follow-up of any disputes with you or third parties.	The processing is carried out by virtue of our legitimate interest consisting in the defense of our interests, including by legal means and, where applicable, in the case of processing of certain categories of data (conviction, offence, security measure), the need to establish, exercise or defend our legal rights.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.
Accounting and Bookkeeping.	The processing is necessary to comply with the accounting and tax	<ul style="list-style-type: none"> • identification data • data relating to your professional life.

	obligations to which we are subject.	
Access to premises and security management if you need to visit our premises.	The processing is carried out by virtue of our legitimate interest in protecting people, our premises and property.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.
Where necessary, the study, organization and execution of transactions relating to our activities, in the context of mergers & acquisitions, spin-offs, etc.	The processing is carried out by virtue of our legitimate interest in seeking investors/purchasers likely to be interested in our activities.	<ul style="list-style-type: none"> • identification data • data relating to your professional life.

In any event, please note that we will not process your personal data for any other purposes that are incompatible with those mentioned above.

4 With whom do we share your personal data?

As part of our processing operations, we may communicate your personal data to the following categories of recipients:

- the entities of the SQLI group (e.g. in the context of our accounting/tax and consolidation obligations at group level), the SQLI departments concerned, as well as any person authorized to have knowledge thereof within the scope of their activities and functions (e.g. departments in charge of accounting, etc.).
- service providers, suppliers, agents and contractors (e.g. IT service providers).
- where applicable, investors/purchasers and their advisors (e.g. in M&A transactions); and
- competent courts, law enforcement agencies, public authorities, government agencies and public entities, where applicable.

In addition, SQLI may communicate your personal data to third parties with whom SQLI has a business relationship. Only data that is relevant and strictly necessary for business management or operational purposes or when required or permitted by applicable regulations will be communicated as such.

Regardless of the recipient, we will only disclose your personal data on a strictly need-to-know basis and only to the extent required to achieve the purposes identified in this Notice.

We do not sell your personal data.

5 Do we transfer personal data outside the European Economic Area (EEA)?

SQLI doesn't transfer personal data outside the European Economic Area.

6 How long do we keep your personal data?

We keep your personal data for no longer than is necessary for the purposes of the processing concerned.

The retention periods we apply vary according to the purpose for which SQLI processes the data in question. The table below shows how long your personal data will be kept for each purpose:

PURPOSE	DATA CATEGORY	RETENTION SCHEDULE
Management of the relationships with the providers, including: (i) preparation and execution of contracts; (ii) management and follow-up of orders placed with us; and (iii) payment of invoices.	<ul style="list-style-type: none"> identification data data relating to your professional life. 	<p>We will keep your personal data for the duration of the contractual relationship with the entity for which you work.</p> <p>Your data may then be stored in an intermediate archive for a maximum period of five (5) years after termination of the contract or our last contact with you, to facilitate the formalization of new services requested during this period.</p>
Compliance assessment of the providers.	<ul style="list-style-type: none"> identification data data relating to your professional life. 	<p>We will keep your personal data for the time necessary to evaluate and select our service providers.</p> <p>In the event of the performance of a contract, we will retain your personal data for the duration of the contractual relationship. Otherwise, we will keep your personal data for a period of five (5) years.</p>
Compliance with our legal and regulatory obligations	<ul style="list-style-type: none"> identification data data relating to your professional life. 	<p>Your data will be kept for the duration of the statute of limitations of the obligations to which we are subject.</p>
Management and follow-up of any disputes with you or third parties	<ul style="list-style-type: none"> identification data data relating to your professional life. 	<p>Your data will be kept for the duration of the dispute and until all possible avenues of appeal have been exhausted.</p>
Accounting and Bookkeeping	<ul style="list-style-type: none"> identification data data relating to your professional life. 	<p>In the form of an intermediate archive: your data is kept for the legal retention period, particularly ten (10) years for accounting obligations.</p>

<p>Access to premises and security management, including CCTV if you need to visit our premises</p>	<ul style="list-style-type: none"> • identification data • data relating to your professional life. 	<p>The data required to access the site (e.g. visitor badge) is kept until you leave the site.</p> <p>Other data recorded during your presence on our sites (e.g. video surveillance images, entry and exit times, etc.) are kept for a maximum of one (1) month from the date of recording and may only be kept longer in the event of an incident (for the time required to resolve the incident).</p>
<p>Where necessary, the study, organization and execution of transactions relating to our activities, in the context of mergers & acquisitions, spin-offs, etc.</p>	<ul style="list-style-type: none"> • identification data • data relating to your professional life. 	<p>Your data will be kept only for as long as is necessary to assess the appropriateness of the transactions envisaged and, where applicable, to carry them out.</p>

In any event, once the applicable retention period has expired, we will irrevocably delete or anonymize your personal data so that you can no longer be identified.

7 What rights do you have?

In accordance with applicable data protection regulations, including the GDPR, you have the following rights: right of access, rectification, erasure, opposition, limitation of processing, portability of your personal data, and to specify instructions regarding the use of your personal data after your death (if and where applicable).

Where the processing of your personal data is based on your consent, you may withdraw it at any time.

- [Right of access](#)

You may request access to your personal data at any time. If you exercise your right of access, we will send you a copy of the data in our possession, together with all information relating to its processing.

- [Right to rectification](#)

You have the right to ask us to rectify, amend or complete any inaccurate or incomplete personal data in our possession.

- [Right to erasure](#)

You have the right to ask us to delete your personal data, for example if it is no longer required for processing.

We will do our best to comply with your request. Please note, however, that we may be obliged to retain all or part of your personal data if we are required to do so by law or if such data is necessary for the establishment, exercise, or defense of our legal rights.

- [Right to object](#)

You may object at any time, for reasons relating to your situation, to our using your personal data. We will then cease processing your personal data unless there are compelling legitimate grounds for us to continue processing your personal data (for example, if your data is necessary to establish, exercise or defend our rights or the rights of third parties in a court of law). If we are unable to comply with your objection, we will inform you of the reasons for our refusal.

- [Right to restrict processing](#)

You may also request that we restrict the processing of your personal data for reasons relating to your situation. For example, if you dispute the accuracy of your personal data or object to its processing, you may also request that we do not process your data for the time necessary to verify and investigate your claims.

In this case, we will temporarily refrain from processing your personal data until the necessary verifications have been carried out or until we comply with your requests.

- [Right to data portability](#)

You may request the portability of your personal data. If you so request, we will provide you with your personal data in a readable and structured format that enables you to re-use it easily.

We would like to draw your attention to the fact that the portability of your personal data applies only to the personal data that you have communicated to us, provided that the communication of your personal data does not infringe the rights of third parties. If we are unable to comply with your request, we will inform you of the reasons for our refusal.

- [Right to withdraw your consent](#)

Where the processing of your personal data is based on your consent, you may withdraw it at any time. Withdrawal of your consent prevents us from processing your personal data, but does not affect the lawfulness of any processing carried out prior to such withdrawal.

- [Right to specify instructions for the use of your personal data after your death \(if and where applicable\)](#)

You can give us instructions on how to use your personal data after your death. For example, you can ask us to store, delete or pass on your personal data to a third party designated by you.

8 How to exercise these rights

To exercise your rights, please contact our dedicated department using the contact details given in Section 9 (How can you contact us?). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or facilitate the location of the personal data concerned by your request.

Please note that some of these rights are subject to specific conditions dictated by the applicable regulations on the protection of personal data. If your situation does not meet these conditions, we will unfortunately be unable to process your request. We will inform you of the reasons for our refusal.

In any event, if you consider that your rights have not been respected or that your personal data has been processed in breach of the applicable regulations on the protection of personal data and the principles set out in this Notice, you may lodge a complaint with the competent courts or with the competent data protection authority, namely the Autorité de protection des données (APD) Rue de la Presse, 35, 1000 Bruxelles.

9 How can you contact us?

If you have any questions or requests concerning the processing we carry out with your personal data under this Notice, including the exercise of your rights, as detailed above, you can contact us, by email at: privacy@sqli.com or by mail, at the following address: Group Legal Department, Privacy Division, Immeuble Maslo, 2-10, rue Thierry Le Luron, 92300 Levallois-Perret.

10 Changes and updates to the Notice

We periodically review this Notice to ensure compliance and to keep it up to date with the applicable data protection regulations.

We will inform you of any changes to this Notice.