



Wolman Wood and Fire Protection GmbH (a 100 % subsidiary of Sika, here in after referred to as "Sika") provides this Business Partner Privacy Notice ("Notice") to explain our practices as the Controller regarding the processing of personal data relating to our current, former or potential vendors, customers, suppliers, and any 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 Sika as an individual (e.g., a consultant or sole entrepreneur) or
- an employee of a Business Partner who interacts with Sika on such Business Partner's behalf.

2. Contact details of the Controller:

Wolman Wood and Fire Protection GmbH („Sika“)
Dr.-Wolman-Straße 31 – 33
76547 Sinzheim
Germany
Mobile: +49 7221 800 0
Fax: +49 7221 800 290
Email: info.wolman@wolman.de

3. Contact details of the Data Protection Officer.

For questions related to our data protection, please contact our data protection officer Mr Kanthaus: datenschutz@de.sika.com.

4. Categories of Personal Data and Sources:

Sika processes the following categories of personal data about you, Sika has obtained from you or from authorized third parties (e.g. your supervisor, public authorities (such as chemical authorities like BAUA or ECHA) or from public sources (e.g. social media like LinkedIn, Facebook):

- **Personal data of Business Partners (Business Partners as individuals or employees):**
 - Name,
 - Name of employer, if you are an employee,
 - Business contact details (email, address, telephone and mobile),
 - Content of communication and interaction (such as email or business letters)
 - Job title/position,
 - Payment and/or invoice information, if you are our direct Business Partner; and
 - marketing/newsletter preferences and your interaction behavior with Sika's marketing activities (including through the use of email trackers to measure click and open rates), in case you consented to receive marketing information from Sika.

5. Processing Purposes, Legal Basis and Consequences:

Your personal data is processed for purposes of

- ☒ performing the contractual relationship with you or a third party (e.g. your employer) or for the implementation of pre-contractual measures in the context of contract initiation (including the fulfillment of contractual obligations, invoice processing, communication),
- compliance with legal regulations,
- (direct) marketing activities (such as customer satisfaction surveys),
- improvements to our Business Partner Management,
- improvements to our product and service offerings, such as new training activities and events or adjusted product information, and/or
- compliance, security and fraud prevention and control measures, and/or
- assertion, exercise or defense of legal claims

For such processing activities, Sika relies on the following legal bases of the General Data Protection Regulation (“GDPR”) and the Telecommunications Digital Services Data Protection Act (Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz “TDDDG”):

- performing the contractual relationship or the contract initiation, if a contractual relationship with you personally exists or is to be entered into (Art. 6 para. 1 lit. b) GDPR);
- legitimate interest of Sika, the companies affiliated with Sika or third parties (such as governmental bodies or courts) (Art. 6 para. 1 lit. f) GDPR). Legitimate interests include communication with you as an employee of one of our Business Partners, group-wide exchange of information, (direct) marketing activities (unless consent is required for this), prevention of fraud or misuse of IT systems, physical security, IT and network security, internal investigations, enhancement of our Business Partner management, improvement of our product and service offerings or potential merger and acquisition activities;
- compliance with legal obligations (Art. 6 para. 1 lit. c) GDPR in conjunction with the relevant legal basis establishing this obligation; data processing for proof of your consent is also carried out on the basis of Art. 6 para. 1 lit. 1 c) in conjunction with Art. 5 para. 1 a), para. 2, Art. 7 para. 1 GDPR);
- consent (Art. 6 para. 1 lit. a) GDPR), insofar as the above legal bases do not apply;
- if information is stored in your terminal equipment or information already stored in your terminal equipment is accessed which is not absolutely necessary for the provision of a telemedia service expressly requested by you, the legal basis for such access is your consent in accordance with Section 25 (1) TDDDG. The subsequent processing of your personal data is based on your consent (Art. 6 para. 1 lit. a) GDPR).

As part of the business relationship, you must provide the personal data that is necessary for the preparation and execution of the business relationship and the fulfillment of the associated contractual or legal obligations or that we are legally obliged to process. Without this data, we may not be able to carry out the business relationship.

6. Categories of Recipients:

Within the company, departments and persons with a justified need for information are only permitted access to personal data to the extent necessary.

To the extent necessary, Sika may transfer your personal data to the following external recipients:

- Processors: Service providers that we use e.g. for the provision of IT applications and for marketing purposes or who are entrusted with the maintenance of our IT systems. These service providers process the personal data on behalf of Sika in accordance with instructions.

- Public authorities: Authorities and state institutions, such as public prosecutors, courts or tax authorities, to which we may have to transfer personal data in individual cases.
- Private entities: Private entities to which we transfer your personal data on the basis of a legal provision or your consent, for example other Sika Group companies or auditors and other consultants.

Some of the recipients to whom personal data is transferred may be located in third countries outside the European Union (EU) or the European Economic Area. Adequacy decisions have been issued by the EU Commission for some countries in which recipients are located. The transfer of data to Switzerland is legitimized on the basis of an adequacy decision by the EU Commission. A copy of the decision can be viewed at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32000D0518>. Where recipients are located in third countries without an adequacy decision by the EU Commission, Sika takes the necessary measures to ensure that such transfers are adequately protected in accordance with the applicable data protection regulations (e.g. by implementing EU standard contractual clauses). You can request a copy of the specific safeguards to ensure an adequate level of data protection by contacting us using the contact details provided in section 2.

7. Retention Period:

Your personal data is stored by Sika 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 Sika no longer needs your personal data for the intended purpose, we will delete it from our systems and from our records, unless we are obliged to retain your personal data in order to fulfill legal or official obligations to which Sika is subject (e.g. statutory retention periods). In accordance with § 147 of the German Fiscal Code, these retention periods can be up to 10 years.

8. Automated Decision-Making:

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

9. Your Data Subject Rights:

As a data subject, you have the following rights

- in accordance with Art. 15 GDPR, you can request information about your personal data processed by Sika; you can also request information about the purposes of processing, the categories of personal data processed, the recipients or categories of recipients to whom data have been or will be disclosed, the planned storage period or the criteria for determining the storage period, the origin of the data if it has not been collected from you, the existence of automated decision-making, including profiling and meaningful information about its logic, scope and impact, the existence of the right to rectification or erasure of personal data concerning you, the right to restriction of processing or to object to such processing, the existence of the right to lodge a complaint with a supervisory authority; finally, you have the right to obtain information as to whether personal data have been transferred to a third country or to an international organization and, where that is the case, as to the appropriate safeguards relating to the transfer;

- in accordance with Art. 16 GDPR, you can request the immediate correction of incorrect or the completion of your personal data stored by Sika;
- in accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by Sika under certain conditions;
- in accordance with Art. 18 GDPR, you may request the restriction of the processing of your personal data if the accuracy of the data is disputed by you, the processing is unlawful, but you refuse erasure or Sika no longer needs the data and you no longer need the data from Sika to assert, exercise or defend legal claims or you have objected to the processing in accordance with Art. 21 para. 1 GDPR, but it has not yet been determined whether Sika has legitimate reasons for data processing that outweigh your interests;
- in accordance with Art. 20 GDPR, data subjects may request the provision of their personal data that they have provided to Sika in a structured, common and machine-readable format or the transfer to another Controller, provided that the processing of this personal data is based on Art. 6 para. 1 sentence 1 lit. a or b GDPR or Art. 9 para. 2 sentence 1 lit. a GDPR and the processing is carried out using automated procedures;

▪ **Right to object according to Art. 21 GDPR:** You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (f) of Article 6(1) GDPR (data processing for the purposes of the legitimate interests and on the basis of a consideration of interests); this also applies to profiling based on this provision in accordance with Article 4(4) GDPR. This personal data will then no longer be processed for these purposes unless compelling legitimate grounds for the processing can be demonstrated which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

▪ **Right to object pursuant to Art. 21 (2) GDPR (objection to data processing for the purpose of direct marketing):** If we process your personal data for direct marketing purposes (see above), you have the right to object at any time to the processing of your personal data for these purposes; this also applies to profiling in accordance with Art. 4 No. 4 GDPR, insofar as it is associated with such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

- in accordance with Art. 7 para. 3 GDPR, you can withdraw your consent to Sika at any time. As a result, Sika may no longer continue the data processing that was based on this consent in the future;
- in accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. A list with contact details of the data protection officers in the federal states can be found at the following link: https://www.bfdi.bund.de/DE/Service/Anschriften/anschriften_table.html

To assert the above rights, you can contact Sika or its data protection officer at any time using the contact details given above. To exercise your data subject rights, you can also use this online form for data subject requests: <https://privacyportal-de.onetrust.com/webform/9aaa3e8a-b171-45d6-b15b-5e7dba70499a/1016d002-a1f3-43da-b8fa-2b755344b7bf>

10. Questiones:

If you have any questions about this notice or your rights, please contact info.wolman@wolman.de

Note:

For the sake of simplicity, the masculine form is used throughout the text. Female / diverse is of course included.