

# Privacy Notice: Individuals employed or engaged by Buyers and Suppliers Controlar Service

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## INTRODUCTION

Achilles Information Limited, Achilles Information AS, Achilles South Europe, S.L.U and their affiliates (“Achilles”/”we”/”us”/”our”) provide supply chain assurance services to buyer and supplier organisations globally. Our supplier pre-qualification services are provided using our supply chain management platforms (our “platform”). As an information led business, we place great importance in ensuring the quality, confidentiality, integrity and availability of the data we hold, and in meeting our data protection obligations where we process personal data. Achilles is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure. This privacy notice explains what personal data Achilles collects about individual users at both buyer and supplier organisations (“you”/”your”) and how we use it. We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the ‘Last Updated’ date at the top of this page. Please review this privacy notice periodically to check for updates.

## PERSONAL DATA WE COLLECT

### If you are employed or contracted by a supplier organisation

We collect your personal data where your organisation has provided such personal data to us in connection with the services offered to your organisation by Achilles (for example, an online supplier questionnaire may request the name of an individual who holds a key position in your business). We may also collect your personal data from a buyer organisation who has asked us to contact you because you are employed or contracted by a supplier organisation that the buyer organisation wishes to have registered on the platform, and are their contact person for that organisation. The personal data we collect covers your name, job title, business email, business telephone number and office address. We also collect information on supplier organisations from publicly available sources and from providers of screening services and combine this with the other information we hold. This sometimes includes information on directors or individuals associated with or working at a supplier organisation and might therefore include your personal data. If you pay for our services using a credit or debit card in your name, we will also collect your card information when you provide it to us.

**If you are employed or contracted by a buyer organisation** We collect your personal data where your organisation has provided such personal data to us in connection with the services offered to your organisation by Achilles (for example, as the Achilles relationship contact or as a named user of the platform). The personal data we collect covers your name, job title, business email, business telephone number and office address.

## HOW WE USE YOUR PERSONAL DATA

**If you are employed or contracted by a supplier organisation** We add the information provided to us by your supplier organisation (typically through the online questionnaire), together with the information we collect from publicly available sources and providers of screening services, to our platform. This includes your personal data.

Once on the platform, your personal data will be visible to:

- the buyer organisations in the Achilles community your organisation has agreed to join; and/or
- where your organisation has agreed to allow access of your information to a specific buyer organisation only, that specific buyer organisation.

### If you are the Achilles contact person for a buyer or supplier organisation

We also use your personal data to help us improve our services and develop our relationship with your organisation. This includes:

- Providing you with account management and contacting you for feedback
- Sharing information with you about how you can use our services
- Providing you with training and support
- Sending you customer satisfaction surveys

- Sending you our newsletter, research reports, insights and other Achilles news

You can unsubscribe from customer satisfaction surveys, our newsletter and associated communications at any time.

Where you are employed or contracted by a supplier organisation and we collect your personal data from a buyer organisation who has asked us to contact you with a view to registering your organisation on the platform, we validate this information using publicly available sources. Once validated we use your personal data to contact and invite you to register your organisation on the platform.

We use credit card details to take payment for our services.

## BASIS FOR USING YOUR PERSONAL DATA

The basis for which we use your data depends on our relationship and how we are using the data.

Where we are using personal data provided by buyer or supplier organisations to provide them with our services, we are doing so because it is necessary for the performance of the service your organisation has registered for or subscribed to, and the contract we have entered into with them. Where we are collecting personal data provided from buyer organisations who wish to engage with your supplier organisation or from screening services, we are doing so because it is in our legitimate interests to invite organisations to become suppliers to our buyer organisations. When we collect personal data from publicly available sources or from providers of screening services, we do so because it is in our legitimate interests to provide our buyer organisations with information to help them identify suitable suppliers and risks in their supply chain.

Where we are using personal data to send you customer satisfaction surveys, newsletters or marketing materials we are doing so because it is in our legitimate interests to collect your feedback, develop our products and services and improve our business. Alternatively, it is because you have consented to receive these types of communication. You can object to, or withdraw your consent for, Achilles using your personal data this way. You can do so by unsubscribing using the link provided in our emails or by contacting us using the details given below.

If you pay for our services using a credit or debit card in your name, we are using the personal data associated with the card because it is necessary for the performance of the contract we have entered into with your organisation.

## SHARING YOUR DATA

We share your data with our group companies, including those in countries outside the European Economic Area (the “EEA”) where the data protection laws are not equivalent to those within the EEA. We do so using Standard Contractual Clauses approved by the European Commission which contractually oblige our group companies in those countries to the standard expected within the EEA.

When we add your personal data to our platform, we share it with:

- buyer organisations in the Achilles community your organisation has agreed to join; and/or
- where your supplier organisation has agreed to share the information with only a specific buyer organisation, the specific buyer organisation your organisation has allowed to access it.

This includes in countries outside the EEA where the data protection laws are not equivalent to those within the EEA. We do so on the basis of explicit consent you have given for your organisation to share your personal data with buyer organisations outside the EEA. If you have not provided explicit consent or wish to withdraw your consent, please contact us at [dataprivacy@achilles.com](mailto:dataprivacy@achilles.com) or by writing to us at the address provided below.

When you provide credit or debit card details to pay for our services, we share this data with banks and our payment transaction providers. We also share your data with service providers and sub-contractors to our business who process data on our behalf.

This includes, for example, cloud service providers such as Microsoft and Amazon Web Services. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract we enter into with them.

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, such as in response to a court order or with government or law enforcement agencies.

## CONTROLAR SERVICE – ACHILLES AS A DATA PROCESSOR

When using the Controlar Service, it is necessary that Achilles (hereinafter referred to as the “**Data Processor**”) accesses to personal data whose processing is under the responsibility of the buyer (hereinafter referred to as the “**Data Controller**”). In this sense, the Data Processor is performing data processing’s in the name and on behalf of the Data Controller and any of the companies of the Data Controller’s Group beneficiary for the service provided by the Data Processor.

In relation to the abovementioned, in the development of any actions under the Controlar Service, Achilles is serving as a data processor when processing the personal data provided by the buyers and suppliers through the Platform (hereinafter referred as to the “**personal data**”).

The Data Processor is authorized to process on behalf of the Data Controller, the personal data necessary to execute the service agreement between those parties.

The Data Processor and the Data Controller have freely agreed to regulate the access and processing of personal data available to the Data Processor by signing a Data Processing Agreement.

## HOW LONG WE KEEP YOUR DATA

We will retain personal data provided to us by supplier and buyer organisations for as long as is necessary to provide them with our services. Where we are relying on our legitimate interests or your consent to process your personal data, we will retain your personal data until you object to us processing it or withdraw your consent.

We will also retain personal data where it is necessary to comply with our legal obligations, resolve disputes and enforce agreements.

We do not retain credit or debit card information once payment has been made.

Please note we need to hold contact details for individuals at supplier and buyer organisations for the performance of the service and the contract we have entered into. If you no longer want us to hold your personal data in these circumstances, we will need an alternative contact detail for your organisation or we will be unable to continue providing your organisation with the service.

## YOUR RIGHTS

Individuals in the EU whose personal data we hold, and process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it. · Where we are using your personal data with your consent, you can withdraw your consent at any time. · Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data

If you wish to exercise your rights, please contact us at [dataprivacy@achilles.com](mailto:dataprivacy@achilles.com).

Individuals in the EU also have the right to lodge a complaint with a supervisory authority in an EU member state if you believe we are infringing EU data protection laws. You can lodge a

complaint with the supervisory authority in your EU member state of residence, the member state in which you work or the member state in which the alleged infringement took place.

## HOW TO CONTACT US

You can contact Achilles in relation to data protection and this privacy notice by writing to:

General Counsel  
Achilles  
30 Western Avenue  
Milton  
Abingdon  
OX14 4SH  
United Kingdom

Alternatively, you can email us at [dataprivacy@achilles.com](mailto:dataprivacy@achilles.com)