# **Privacy policy for consultants**

### Data controller

If you, as an individual or employee of a company, operate or have operated as a consultant for HellermannTyton Limited, we record and process your personal data.

HellermannTyton Limited, Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ (hereinafter "HellermannTyton" or "we") is the data controller for your personal data and hence responsible for the processing of your personal data in accordance with the applicable data protection laws and provisions.

If you have any queries concerning your personal data, please contact our data protection manager:

**Hayley Foster** 

Tel.: +44 (0)1293 608905

HellermannTyton Limited, Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ

E-mail: hayley.foster@hellermanntyton.com

### Categories of personal data affected

The following list contains the categories of personal data that may be processed. Please note that not all of the personal data contained in the following list will necessarily be processed. The examples listed under the individual categories are not exhaustive.

Personal data, e.g. name, date of birth, gender, nationality

**Organizational data**, e.g. consultant number, service description, place of work, department **Contact data**, e.g. address, e-mail address, telephone number

**Consultant management data**, e.g. consultant's contract and information on the time on which the commission commenced and finished, activities performed

Time-related data, e.g. working hours, hours worked

**Security data**, e.g. access cards, access rights and the usage of access cards and rights

**Health and safety data**, e.g. information on work-related incidents

**IT-related data**, e.g. user ID, passwords, log-in data as well as data and protocols on your use of IT equipment, applications or services of HellermannTyton in accordance with the applicable IT guidelines

Financial data, e.g. bank account data if you are a sole proprietor

## Legal basis

#### **Legal basis**

We may be legally obliged to process your personal data, e.g. in order to report transactions to authorities.

#### **Contractual obligation**

We may be obliged to process your personal data in order to fulfil a service contract that you or your employer has signed.

#### **Legitimate interest**

Our legitimate interests include e.g. the management of the business relationship for the purpose of fulfilling contracts that affect you or your employer. Furthermore, our legitimate interest

fundamentally involves carrying out normal business operations, protecting technical facilities and equipment and conducting internal checks.

In exceptional cases and only if no other legal basis applies, we will ask you for you explicit consent to the processing of your personal data. You may withdraw your consent at any time. However, this has no effect on the lawful processing based on your consent before the withdrawal.

# Purposes of processing

Your personal data, as listed in the examples under "Categories of personal data affected" will be processed for the general purposes indicated below. The examples listed under the individual purposes are not exhaustive.

#### **Administration**

- To enable your registration in the systems of HellermannTyton and general administration of your employment with us
- To enable the proper usage of licences
- To enable the upkeep of an up-to-date organizational chart and consultant records, including the drafting of internal reports and statistics
- To enable the tracking of projects

#### Reporting

- To enable reporting to authorities when legally obliged
- To enable the recording of your working hours for purposes paying the invoice to you or your employer

#### Safety of the working environment and product safety

- To enable the fulfilment of our obligation to provide a safe working environment (including access control and prevention of unauthorized access to the site or operating equipment), as well as additional obligations relating to the working environment in accordance with occupational health and safety or employment laws
- To enable the fulfilment of obligations in connection with product safety and quality

#### Work-related activities

- To enable the execution of work assignments, e.g. writing of e-mails, drafting of documents, reports, preparations or drawings
- To enable the answering of questions from you/your supervisor/the personnel department in connection with your employment or IT equipment or the provision of support required for you to be able perform your work assignments
- To enable inspections to be conducted in connection with the applicable guidelines from HellermannTyton, including the IT Guideline to ensure that such guidelines are observed and to investigate any allegations of prohibited activities.

## Source of the personal data

We receive your personal data from you or your employer. Some personal data may also be automatically generated by the IT system of HellermannTyton or similar systems, such as when creating your User ID.

### Data transfer to third parties

If it is necessary for the processing of personal data, we transfer your personal data to other companies within the corporate group (LINK) or to external sites. These also include companies outside of the European Union or the European Economic Area. We do of course ensure that the data recipients offer a sufficient guarantee that the data will be used lawfully and securely and that they are contractually obliged to observe the statutory regulations.

Furthermore, we reserve the right to transfer personal data to third parties if we are forced to do so by law, judicial decision of the responsible court or decision by the relevant public authority or if we are compelled by actions or omissions on your part to have our rights, property or assets protected or asserted by relevant public authorities.

### Storage period

Your personal data will normally be stored during the period of your consultancy agreement. After termination of the consultancy agreement, we will only retain personal data that is regarded as necessary to fulfil the purposes for which it was obtained and only until these purposes have been fulfilled and, if for a longer period, only until it may be necessary in order to fulfil the local legal obligations or to fulfil statutory requirements in the case of actual, pending or expected disputes or claims.

### Your rights as data subject

- **Right of access (Art. 15 GDPR):** You can request information at any time on whether and which personal data is being used by us, for what purposes the processing is taking place, where the data originates from, to which recipients the data is transferred if necessary and how long such data is stored by us.
- **Right to rectification (Art. 16 GDPR):** If you see that personal data concerning you is incorrect, you can demand that such data be rectified at any time. Where in your view data is incomplete, you can also demand that data should be completed.
- **Right to erasure (Art. 17 GDPR):** If, in your opinion, the use of your personal data is no longer necessary or is taking place without sufficient legitimate basis or is unlawful for other reasons, you can demand for this data to be erased.
- **Right to restriction of processing (Art 18 GDPR):** Instead of the erasure of data, you can also demand the processing of your data to be restricted if data is being processed unlawfully. In particular, you can also demand such a restriction of processing when you contest the accuracy of data or you have objected to use of the data.
- Right to data portability (Art. 20 GDPR): With respect to personal data that you have
  provided yourself and which is being used on the basis of a contract or consent, you can
  demand for this data to be made available to you in a structured, commonly used and
  machine-readable format. You can also demand for this data to be transferred directly to
  another controller.
- **Right to object (Art 21 GDPR):** If grounds arise relating to your particular situation that render use of your personal data that we process on the basis of a balancing of interests impermissible, you have the right to object to such use of the data. If your personal data is used for direct marketing, you do in any case have a right to object.
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR): If in your opinion, your rights relating to the personal data concerning you have been infringed, you

have the right to lodge a complaint with a supervisory authority. In particular, you may contact the supervisory authority responsible for your place of residence, place of work or place of the alleged infringement.

To send us an enquiry relating to your data, please complete the following request form: **Annex 4** 

Please send the completed form by post or e-mail to our data protection manager:

**Hayley Foster** 

Tel.: +44 (0)1293 608905

HellermannTyton Limited, Griffin House, 135 High Street, Crawley, West Sussex, RH10

1DQ E-mail: <a href="mailto:hayley.foster@hellermanntyton.com">hayley.foster@hellermanntyton.com</a>

Please remember to attach documents that enable your identity to be verified.