



# Privacy notice for Suppliers

What we do with your data

Last update: November 2020

Applicable to all Suppliers of Euroclear Sweden

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# 1 About this Privacy Notice

## 1.1 Who and what is this notice for?

This notice applies to the personal data of natural persons working for our suppliers or acting as agent or representative of our suppliers (“you”, “your”). Suppliers are understood as any third party that provides goods or services to Euroclear (such as a consultant, contractor, advisor or vendor). Board members under a non-employee status are also considered as suppliers.

This notice explains what types of personal data are gathered from our suppliers, how the personal data is used, and with whom the personal data is shared. It also sets out our suppliers’ rights in relation to personal data.

## 1.2 Who controls your personal data?

Euroclear Sweden takes its data protection obligations seriously. We, Euroclear Sweden AB, with registered office at Klarabergsviadukten 63, Po Box 191, SE - 101 23 Stockholm (Sweden) and registered under organisation number 556112-8074 (“Euroclear”, “we”, “us” or “our”), are the controller of your personal data and are therefore responsible for processing it in accordance with the law.

# 2 Personal data

## 2.1 What personal data do we collect from you and why?

The primary reason we process your personal data is to approve, manage, administer or effect an agreement between Euroclear and the supplier you represent or work for. In this respect, we use your personal data, i.a. to organize our sourcing activities, issue purchase orders, process payments, perform accounting, manage our contract or review the services or products you supply us with.

In addition, we process personal data to meet our legal obligations (such as record keeping obligations, screening duties of board members), as well as to manage our risks and operations (e.g. prevent and detect security threats, exercise or defend legal claims).

More details are provided in the table below.

Purposes of the Processing	Types of Personal Data
Administration and reporting	<ul style="list-style-type: none"><li>• Business card details <sup>1</sup></li><li>• IT and telephone<sup>2</sup></li><li>• System and applications<sup>2</sup></li><li>• Transactions reporting<sup>2</sup></li></ul>
Sourcing	<ul style="list-style-type: none"><li>• Business card details<sup>1</sup></li><li>• Professional / Educational background checks</li><li>• Rates / prices</li><li>• CVs<sup>2</sup></li></ul>

<sup>1</sup> Business card details include name, title, company, mailing address, and telephone numbers.

<sup>2</sup> Only applicable to contractors/consultants

Purposes of the Processing	Types of Personal Data
Contract management	<ul style="list-style-type: none"> <li>• Business card details<sup>1</sup></li> <li>• Agreement</li> <li>• Management of supplier relationship</li> <li>• Criminal record<sup>2</sup></li> <li>• Financial status<sup>2</sup></li> <li>• Contact persons in case of emergency<sup>2</sup></li> </ul>
Assessment of suppliers' performance	<ul style="list-style-type: none"> <li>• Business card details<sup>1</sup></li> <li>• Information/surveys on performance of supplier</li> </ul>
Access and security management	<ul style="list-style-type: none"> <li>• Business card details<sup>1</sup></li> <li>• Access and authorities</li> <li>• Photography</li> <li>• Recorded material on surveillance cameras</li> </ul>
Payment of invoices	<ul style="list-style-type: none"> <li>• Business card details<sup>1</sup></li> <li>• Financial details</li> <li>• Invoice details</li> </ul>

## 2.2 What is the legal basis for processing your personal data?

As explained above (in section 2.1), we normally only process personal data about you where:

- It is necessary to enter into a contract or carry out a contract with the entity you represent;
- It is necessary to comply with our legal obligations, e.g. verifying working permits; or
- It is in our legitimate business interests e.g. building security if you visit our office, or to protect our IT infrastructure.

## 2.3 How long is personal data kept?

As a general rule, we keep personal data as long as we have a relationship with the supplier you represent or work for. After a contractual relationship ends we must keep it for a period of 7 years (to answer any contractual liability issues following the statutory period of limitations set by the Swedish Accounting Act).

Images recorded by security cameras in and around our premises are kept for 30 days from the visit, except otherwise requested by the police / public prosecutor and / or legal department (this will notably be the case if the recorded images show potential criminal activity or incidents).

## 2.4 Where does your personal data come from?

The personal data we collect from you come from the following sources:

### a) Personal data you give us

We collect personal data from you when you:

- send us personal data on forms and e-forms, such as your name, address, telephone number, tax identification number, date of birth, copy of passport or ID card;

- provide us personal data necessary to enter into a contract, such as your name, address, professional phone number and e-mail address, function and/or position held within our supplier's organisation; or
- provide us personal data during the performance of your services for Euroclear.

#### b) Information we receive from other sources

We collect your personal data through:

- background information from third party providers;
- our employees or business relationships, such as feedback on you we receive from other contractors or our employees;
- publicly available sources to confirm signatory powers; or
- details on your intervention in board meetings (i.e. through board minutes).

## 2.5 Who do we share your personal data with?

#### a) Transfer within the Euroclear Group or to third parties

- We may transfer personal data only to other Euroclear affiliated entities or our business partners (e.g. joint venture companies), which are or will be involved in receiving services from our suppliers. We take precautions to allow access to personal data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the personal data for any other purpose.
- Euroclear may also provide your personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities, the tax and social security agencies, as well as courts, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- We also disclose your personal data to our third party vendors, service providers and partners who provide data processing services to us (e.g. IT platform management or support services, infrastructure and application services, data analytics, security agents), or who otherwise process personal data for purposes that are described in this privacy notice or notified to you when we collect your personal data.
- We may also disclose your personal data with our auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.

#### b) International personal data transfers

Our group companies and third party contractors and consultants operate around the world. This means that we may process personal data outside the European Economic Area (EEA). However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this notice. These include implementing data transfer clauses with our third party vendors, contractors and consultants and binding corporate rules for transfers of personal data within our group.

## 2.6 What are your rights regarding personal data?

The right to be informed

Euroclear is publishing this privacy notice to keep you informed as to what we do with your personal data. We strive to be transparent about how we use your personal data.

The right to access	You have the right to access your personal data. Please contact Euroclear’s Data Protection Officer if you wish to access the personal data Euroclear holds about you, at the postal address mentioned in section 4 of this notice.
The right to rectification	If the personal data Euroclear holds about you is inaccurate, not complete or up to date, you have the right to ask us to rectify or update it. If such personal data has been disclosed to a third party in accordance with this privacy notice, then we shall also ask them to rectify or update your personal data. Please contact our Data Protection Officer if you need us to rectify your information at the postal address mentioned in section 4 of this notice.
The right to erasure	This is sometimes called ‘the right to be forgotten’. If you want to request Euroclear to erase your personal data and we do not have a legal reason to continue to process and hold it, please contact our Data Protection Officer at the address mentioned in section 4 of this notice.
The right to restrict processing	In some circumstances, you have the right to ask Euroclear to restrict how we process your personal data. This means we are permitted to store the data but not further process it. If you want us to restrict processing of your personal data, please contact our Data Protection Officer at the address mentioned in section 4 of this notice.
The right to data portability	In some circumstances, Euroclear allows you to obtain the personal data we hold about you in a structured, commonly used and machine-readable format and to transmit those personal data to another controller without any hindrance. Please contact our Data Protection Officer at the address mentioned in section 4 of this notice, if you want information how to transfer your personal data elsewhere. This right only applies to personal data that you have provided to us as a data controller. The personal data must be processed on the basis of your consent or for the performance of a contract and processing of your personal data must be carried out by automated means.
The right to object	In some circumstances, you have the right to object to Euroclear processing your personal data. If you wish to object please contact our Data Protection Officer at the address mentioned in section 4 of this notice.
The right to withdraw consent	If you have given us your consent to process your data but would change your mind later, you have the right to withdraw your consent at any time, and Euroclear will then stop processing your personal data. If you want to withdraw your consent, please contact our Data Protection Officer at the address mentioned in section 4 of this notice. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
Right to opt-out of marketing communications	You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing), please contact our Data Protection Officer at the address mentioned in section 4 of this notice.

### The right to complain to a Supervisory Authority

You have the right to complain to your local data protection authority about our collection and use of your personal data if you feel that Euroclear has not sufficiently addressed a concern or complaint. For more information, please contact your local data protection authority. You can find contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) [here](#). Contact details for the Swedish Data Protection Authority can be found here: <https://www.datainspektionen.se>.

## 2.7 What about data security and quality?

We implement risk-appropriate measures and processes that are designed to provide a level of security appropriate to the risk of processing your personal data to help us to keep your personal data secure and to maintain its quality.

To keep your personal data secure, we have implemented a number of security measures:

- **Secure operating environments** - We store your data in secure operating environments and only accessible to Euroclear employees, agents and contractors on a need-to-know basis. Euroclear also follows generally accepted industry standards in this respect.
- **Encryption** - We use industry-standard encryption to provide protection for information that is transmitted to us.
- **Prior authentication for IT access and access to premises** - We require our staff and contractors to verify their identity (e.g. through login ID, password, pin codes and badges) before they can access IT bases and business premises. This is aimed to prevent unauthorized accesses.

## 2.8 What if you choose not to give us your personal data?

If you do not want to give us your personal data and the personal data is necessary in order to enter a contract or pursue business relations with our supplier then we will not be able to enter into that contract or pursue our contractual relationship.

## 3 Updates to this notice

We may update this notice from time to time in response to changing legal, technical or business developments. You can see when it was last updated by checking the “last updated” date displayed at the top of this notice. Please consider the version available online [www.euroclear.com/Sweden-GDPR](http://www.euroclear.com/Sweden-GDPR) as the latest version.

## 4 Questions or concerns?

If you want to request information about this notice, you can contact our Data Protection Officer by e-mailing us at [es.dpo@euroclear.com](mailto:es.dpo@euroclear.com) or writing to our Data Protection Officer by writing to Euroclear Sweden AB, Data protection officer. PO Box 191, SE-101 23 Stockholm, Sweden.