

## **Inteva GDPR Information - Information about the processing of Personal Data by Inteva's EU entities**

Inteva's entities in the European Union intend to process Personal Data in accordance with the EU General Data Protection Regulation ("GDPR", Regulation 2016/679/EC).

Please note: This information applies only to the processing of Personal Data about Inteva's business partners such as suppliers or vendors, service providers, independent contractors and (prospective) customers by Inteva's entities in the European Union.

For information about the processing of European Personal Data by Inteva Products, LLC in the United States of America under the EU-U.S. and Swiss-U.S. Privacy Shield, please refer to the "Privacy Shield Privacy Policy" instead (<http://www.intevaproducts.com/privacy-policy>).

Inteva is committed to your privacy and the highest standards of data protection. Compliance with data protection laws, in particular the GDPR, is of utmost importance to Inteva. Inteva takes the protection of your Personal Data very seriously. Inteva maintains appropriate administrative, technical and organizational measures designed to help safeguard the confidentiality and integrity of your Personal Data and to protect it against accidental or unlawful destruction, accidental loss, unauthorized alteration, disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in its possession.

The following information serves to inform you about how Inteva processes your Personal Data.

### **1. Controller**

The respective Inteva entity in the EU to which you or your employer provide(s) your Personal Data is responsible for the processing of your Personal Data as described below. The list of Inteva's EU entities is attached to this Information as [Annex 1](#).

In the following, the term "Inteva" refers to the respective Inteva EU entity responsible for the processing of your Personal Data.

For questions or concerns about the processing of your Personal Data by any of Inteva's EU entities, you can contact Inteva's data protection team via e-mail: [intevaeurope\\_personaldata@intevaproducts.com](mailto:intevaeurope_personaldata@intevaproducts.com).

### **Purposes and legal basis of the processing of Personal Data**

Inteva processes your Personal Data only for defined purposes and in accordance with a legal basis provided by the GDPR. In particular, Inteva processes your Personal Data:

#### **a. For the initiation or performance of a contract**

Inteva processes your Personal Data where it is necessary for the initiation or performance of a contract. This includes processing of your Personal Data for the following purposes:

Fulfillment of contracts with regard to parts and services delivery, product lifecycle and warranty, continuous provision of services and spare parts, assurance of necessary communication during production and post production periods.

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### **b. To comply with Inteva's legal obligations**

Inteva processes your Personal Data where it is necessary for Inteva to comply with its legal obligations. This includes processing of your Personal Data for the following purposes: Accounting and archiving based on legal requirements

### **c. To pursue Inteva's legitimate business interests**

Inteva processes your Personal Data to pursue its legitimate business interests. These legitimate business interests include:

Project management and tracking, quality reporting, logistics and order management, access to facilities and IT and communication systems such as EDI, provision of our supplier portal (<https://www.plexus-online.com/modules/systemadministration/login/index.aspx?>) if you are the contact person that registered the account with your individualized email address

Inteva only processes your Personal Data for these legitimate business interests where this is compatible with your fundamental rights and freedoms which require protection of Personal Data.

## **2. Categories and sources of Personal Data**

Inteva processes the Personal Data that you or your employer provides to Inteva.

## **3. Recipients of Personal Data**

Within Inteva, your Personal Data is accessed by Departments and employees which require such access to perform their functions or job duties.

Inteva discloses your Personal Data to Inteva Products, LLC, where Inteva Products, LLC processes your Personal Data on behalf of and under instruction from Inteva. Disclosure of your Personal Data to Inteva Products, LLC also takes place for purposes of information and relationship management, business purposes including data analysis, audits, developing and improving products and services, determining the effectiveness and enhancing, improving or modifying our services and products, for risk management, compliance with our legal and regulatory obligations, prevention and investigation including "know your client and "anti-money laundering", compliance with sanctions procedures and due diligence.

Recipients of your Personal Data outside the Inteva group include vendors and service providers which process your Personal Data on behalf of and under instruction from Inteva, as well as tax authorities, auditors and external legal counsel.

## **4. Transfers of Personal Data to Third Countries**

Your Personal Data is transferred to Inteva Products, LLC in the United States of America, as described above in section 4. Inteva Products, LLC is a certified participant in the EU-U.S. and Swiss-U.S. Privacy Shield framework. The EU-U.S. Privacy Shield is based on a decision by the European Commission stating that certified participants provide an adequate level of data protection. You can find more information about the EU-U.S. and Swiss-U.S. Privacy Shield at <https://www.privacyshield.gov>. For more information about the processing of Personal Data by Inteva Products, LLC, please refer to the "Privacy Shield Privacy Policy".

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Your Personal Data is also transferred by Inteva Products, LLC to further recipients in third countries. In these cases, your Personal Data is safeguarded through appropriate contracts in line with the EUU.S. and Swiss-U.S. Privacy Shield. These practices are regularly assessed and revised as necessary by Inteva to ensure ongoing protection of Personal Data. For more information, please refer to the section "Accountability for Onward Transfer" in the "Privacy Shield Privacy Policy".

### **5. Storage periods**

Inteva stores your Personal Data for as long as is necessary for the purposes for which the Personal Data is processed (see section 2). The criteria used to determine our retention periods include: (i) the length of time we have ongoing relationship (ii) Inteva may also retain your Personal Data where legally mandated storage periods apply (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations)

### **6. Your rights**

You have the following rights regarding Inteva's processing of your Personal Data:

- a. Right of access: You have the right to obtain from Inteva confirmation as to whether or not Personal Data about you is being processed by Inteva, and, where that is the case, access to the Personal Data and further information about the processing.
- b. Right to rectification: You have the right to obtain from Inteva rectification of inaccurate Personal Data and to have incomplete Personal Data completed.
- c. Right to erasure (right to be forgotten): Under certain circumstances, you have the right to obtain from Inteva erasure of Personal Data. For example, you may have a right to erasure where the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if the Personal Data has been unlawfully processed.
- d. Right to restriction of processing: Under certain circumstances, you have the right to obtain from Inteva restriction of processing of your Personal Data, meaning that Inteva will only store the Personal Data, process it with your consent or process it for the limited purposes allowed by the GDPR for restricted Personal Data. For example, you may have a right to restriction of processing if you have contested the accuracy of the Personal Data.
- e. Right to data portability: You have the right to receive from Inteva the Personal Data that you have provided to Inteva for the performance of a contract in a common and machine-readable format. You have the right to transmit or have transmitted, where feasible, that Personal Data to another Controller.
- f. Right to object: Under certain circumstances you may have a right to object to the processing of your Personal Data, meaning that Inteva will only continue to process that Personal Data on compelling legitimate grounds or in the context of legal claims. The right to object is explicitly brought to your attention clearly and separate from any other information below at section 9.

To exercise the rights described above, please use contact details in Annex 1. of this Information.

If you believe that Inteva's processing of your Personal Data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority in the country where you live, work or where you believe the infringement takes place.

**7. Right to object**

Where Inteva processes your Personal Data to pursue its legitimate business interests (see above section 2.c.), you have the right at any time to object to the processing of your Personal Data on grounds relating to your particular situation.

If you object to the processing of your Personal Data on grounds relating to your particular situation, Inteva will no longer process the Personal Data unless Inteva demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or in the context of legal claims.

To object to the processing of your Personal Data please use contact details in Annex 1. of this Information.

**Annex 1 to Inteva GDPR Information**

Inteva's EU entities

- 1. Inteva Products Holding Cooperatieve, U.A**  
*Capellalaan 115  
2132JM Hoofddorp, Amsterdam The Netherlands  
e-mail:  
intevaeurope\_personaldata@intevaproducts.com*
- 2. Inteva Products Netherlands, B.V.**  
*Capellalaan 115  
2132JM Hoofddorp, Amsterdam The Netherlands  
e-mail:  
intevaeurope\_personaldata@intevaproducts.com*
- 3. Inteva Products Europe GmbH**  
*Piepersberg 12  
42653 Solingen Germany  
e-mail:  
intevaeurope\_personaldata@intevaproducts.com*

In case of questions or concerns about the processing of your Personal Data by Inteva's entities located in Germany you may also contact the appointed Data Protection Officer:

*Scheja und Partner Rechtsanwälte mbB  
Jens-Martin Heidemann  
Adenauerallee 136  
53113 Bonn  
Deutschland  
Tel.: (+49) 0228-227  
226 0 Fax: (+49) 0228-  
227 226 26  
<https://www.scheja-partner.de/kontakt/kontakt.html>  
[www.scheja-partner.de](http://www.scheja-partner.de)*
- 4. Inteva Procuets France SAS**  
*18 Chemin des Gauriers  
45600 Sully sur Loire France  
e-mail:  
intevaeurope\_personaldata@intevaproducts.com*
- 5. Inteva Products Czech Republic, A.S.**  
*Prumyslova 907 Rychnov  
- Czech Republic  
e-mail:  
intevaeurope\_personaldata@intevaproducts.com*

## **Inteva GDPR Information - Information about the processing of Personal Data by Inteva's EU entities**

### **6. Inteva Lozorno spol, s.r.o.**

*Automobilový priemyselný park 1006*

*Lozorno 900 55 Slovakia*

*e-mail:*

*intevaeurope\_personaldata@intevaproducts.com*

### **7. Inteva Closures S.R.L.**

*140 Calea Aradului,*

*Salonta, Bihor County, 415-500*

*Romania*

*e-mail:*

*intevaeurope\_personaldata@intevaproducts.com*

### **8. Inteva Products UK Limited**

*Unit 43 Vaughan Trading Estate,*

*Tipton*

*United Kingdom, DY4 7UJ*

*e-mail: intevaeurope\_personaldata@intevaproducts.com*