

## Information on Data Protection and Data Processing

This document provides important information, in a summarised form, on the protection of your personal data as regulated by the General Data Protection Regulation (GDPR)

### 1. Who is the data controller?

Procurement Services GmbH,  
Am Belvedere 1,  
1100 Wien

<https://www.erstegroup.com/en/about-us/subsidiaries/erste-group-procurement>

Contact for data protection – related inquiries:

Procurement Services GmbH  
Am Belvedere 1,  
1100 Vienna  
<mailto:Gdpr.egp@erstegroup.com>

### 2. What personal data is processed and how is it collected?

We process the following personal data.

- Master and legitimization data/Personal master data (e.g., first name, last name, business address).
- Contact data (business contact information; e-mail address, telephone number etc.)
- Identification data/Behaviour data: e.g., IP address, browser details, the click history on the website of the service provider (GEP; see Item 8), location.
- Contract data.
- In addition, when registering natural person as described in Item 5 of this information sheet, we process the following personal data based on previously given consent: registered address, facial image, passport or any identity card data

Most of the personal data that we process about you has been provided by yourself; for example, when registering on the website, by visiting the home page, etc.

The exceptions are listed in Item 4 of this information sheet.

You have the right to access a detailed list of the data we hold about you.

### **3. For what purposes and on what legal bases will my personal data be processed?**

Erste Group Procurement (EGP) is the central supply management organisation within Erste Group (EG), managing tender proceedings from the procurement perspective. EGP undertakes and is responsible for the execution of all supply management activities. In carrying out these activities, we make use of personal data. In detail, this means the following.

#### **Processing due to a legitimate interest**

There is a legitimate interest in the processing of data, by us or by third parties, in the following cases.

- To be able to conduct tender proceedings, to know with whom our employees can communicate in relation to a tender proceeding.
- Intragroup transfers of information with other members of the corporate Erste Group (e.g., for administrative purposes).
- To prevent unauthorised access, intrusion, misuse of the system and networks, personal data breaches, and cyber-attacks.
- To monitor access to systems.
- To detect and investigate security incidents.
- To investigate and report data breaches
- Exercising or defending rights
- Documentation of past damage cases as a decision-making aid for entering into new or extended business relationships
- Improving data quality
- Measures for process and quality management: We collect data on our processes and services on an event-driven basis. We use these data to ensure the quality of our services, compliance with our service standards and the efficiency of our processes.
- If you send us a file containing a digital signature or a digital seal, we will transmit this document to a validation service (e.g. signature verification service of "Rundfunk und Telekom Regulierungs-GmbH" – the radio and telecommunications regulatory company) for signature/seal verification.
- If we provide a document that contains your data with our digital signature, we will transmit the document to a trust service provider (e.g. A-Trust).

#### **Contractual necessity as a lawful basis for processing**

- In some cases, the completion of a tender proceeding results in contract signature. Each contract necessitates the processing of personal data. The data subject is a party to the contract or must take steps in order to enter into a contract. At the very least, this requires contact information. There are various types of procurement, and various types of contracts. The scope of data processing is defined in the contract documents.

## Processing based on consent

If there is neither a contract nor a legal obligation or legitimate interest, data processing may still be lawful if you have given us your consent to do so. The scope and content of such data processing always corresponds to the consent. You also have the right to withdraw your consent at any time.

However, a withdrawal does not affect the lawfulness of any processing consented to and already undertaken. In other words, a withdrawal does not apply to past data processing activities.

### 4. Will data other than those collected from me be processed?

Most of the personal data we process about you was provided by you. However, your data may also originate from other sources:

Data source	Category of data	Purpose and legal basis
Publicly available official registers, e.g., commercial registers, registers of crafts and trades, business credit checks and reports	Master data, especially name	Verification of authorised signatories
	Functions, corporate positions	To determine the financial health of potential business partners
	Financial strength and risk indicators	Legitimate interest in processing operations to improve data quality

### 5. Am I obliged to provide my personal data? What if I don't want to?

For our business relationship, we need some of your personal data. If we do not know your name and your e-mail address, for example, we will not invite you to participate in any EGP tender proceeding. With your e-mail address and name, we can contact you about day-to-day business and the tender itself. We will process your personal data only when necessary for the conducting of normal business procedures. If you do not want us to process your personal data, we may unfortunately not be able to do business with you,

If we are only allowed to process your data based on your consent, any such consent must be given by you on a purely voluntary basis. You are in no way obliged to provide your data in these cases.

In case you wish to participate as a natural person in the tender proceedings managed by EGP, to carry out know your supplier (KYS) procedure we will have to ask for your passport or any identity card data. The purpose of such processing is identification. If you do not consent, we may unfortunately be unable to enter a business relationship.

Separate consent shall be provided by the natural person that wish to be registered to be able to participate in the tender proceedings.

## 6. Is there decision-making based on automated processing – including profiling?

At the beginning of or during our business relationship, we do not use automated decision-making, in accordance with GDPR article 22.

## 7. To whom will my personal data be disclosed?

Your personal data may be disclosed to:

- Within bodies and persons of Erste Bank and Erste Group who require the data for contractual, legal or regulatory duties as well as for legitimate interests.
- Public bodies and institutions, if we are legally obliged to do so (e.g., financial authorities).
- Third parties commissioned by us; e.g., for IT and back office services, and bank auditors if they need such data to perform their work. Third parties are contractually obliged to treat your data as confidential, and to process them only within the scope of the services being provided.
- Third parties, if this is binding for performance of the contract or due to legal requirements.
- Validation services, e.g. Rundfunk und Telekom Regulierungs-GmbH (the radio and telecommunications regulation company), to the extent this is necessary to verify a digital signature or digital seal transmitted by you.
- Trust service providers, e.g. A-Trust, if we provide a document containing your data with our digital signature.

Disclosure to third parties may also take place if you have consented to the disclosure and for the period of your valid consent.

List containing an overview of potential recipients:

AT	CZ	HU	RO	HR/SI/SRB/ME	SK
Bausparkasse der oesterreichischen Sparkassen AG	Ceska sporitelna, a.s.	Erste Bank Hungary Zrt.	Banca Comerciala Romana SA	Erste & Steiermaerkische Bank d.d.	Slovenska sporitelna, a.s.
EB Restaurantsbetriebe GmbH	CS NHQ, s.r.o.	ERSTE BEFEKTETESI Zrt	BCR Banca pentru Locuinte SA	Erste & Steiermaerkische s-Leasing	Asset Management Slovenskej sporitelne, spravcovská spoločnosť, a.s.
Erste Asset Management GmbH	Dostupné bydlení České spořitelny a.s.	ERSTE Ingatlan Fejlesztő, hasznosító és Működési Kft	BCR Fleet Management SRL	ERSTE BANK A.D. PODGORICA	Procurement Services SK s.r.o.

Erste Bank der oesterreichischen Sparkassen AG	Erste Grantika Advisory a.s.	Erste Jelzálogbank Zrt.	BCR Leasing IFN SA	ERSTE BANK AD NOVI SAD	LANED a.s.
Erste Bank und Sparkassen Leasing GmbH	Leasing České spořitelny, a.s	Erste Lakas-Takarekpenztar Zartkoruen Mukodo Reszvenytarsas ag	BCR Pensii, SOCIETATE DE ADMINISTRARE A FONDURILOR DE PENSII PRIVATE S.A.	ERSTE d.o.o. - drustvo za upravljanje obveznim mirovinskim fondom	
Erste Campus Immobilien AG & CO KG	Erste Operations GmbH, odštěpný závod	Erste Asset Management Ltd	SUPPORT COLECT SRL	Erste Group Card Processor d.o.o.	
Erste Group Bank AG	Factoring Ceske sporitelny, a.s.	Collat-real Korlátolt Felelősségű Társaság	BCR Payment Services SRL	ERSTE NEKRETNINE d.o.o. za poslovanje nekretninama	
Erste Digital GmbH	Česká spořitelna - penzijní společnost, a.s.	Erste Tower Kft	BCR Social Finance IFN S.R.L.	s-Leasing Beograd/Serbia	
Erste Group Services GmbH	REICO Investicni spolecnost Ceske sporitelny, a.s.	Procurement Services HU Ltd.	SAI Erste Asset Management S.A.	S-RENT d.o.o. Beograd	
Erste Group Immorent GmbH	Stavebni sporitelna Ceske sporitelny, a.s.		Procurement Services RO srl	Erste Asset Management d.o.o.	
Intermarket Bank AG	Erste Asset Management GmbH, pobočka Česká republika		BCR Seed Starter S.R.L.	Erste Card Club d.o.o.	
Mundo FM&S GmbH	ČS Seed Starter, a.s.			Procurement Services HR d.o.o.	
OM Objektmanagement GmbH	Procurement Services CZ s.r.o				

s REAL Immobilienvermittlung GmbH					
s ServiceCenter GmbH					
s Wohnfinanzierung Beratungs GmbH					
Salzburger Sparkasse AG					
Erste Operations GmbH					
Sparkasse Hainburg-Bruck-Neusiedl AG					
Tiroler Sparkasse AG					
Erste Immobilien Kapitalanlagegesellschaft m.b.H.					
Procurement Services GmbH					
FLiP GmbH - gemeinnützige Gesellschaft zur Förderung finanzieller Bildung					
Erste Social Finance Holding GmbH					
Pacemaker GmbH					
Erste Sparkassen Services GmbH					
George Labs GmbH					

## 8. Are my personal data transferred to a third country?

Your personal data may be transferred to a third country in the following cases:

- this is necessary in order to assert, exercise or defend legal claims or there is a legal obligation
- Our processors may co-operate with sub-processors in third countries. (Currently this is not done.) Unless the transfer is based on an adequacy decision of the European Commission, we will transfer the data on the basis of appropriate or suitable safeguards.
- You will receive a special notification in other cases of data being transferred to a third country

EGP uses 'SMART by GEP', a SaaS (Software as a Service) arrangement, to carry out all procurement processes electronically. This SaaS is provided by NB Ventures, Inc. (doing business as GEP), 100 Walnut Avenue, Suite 304, Clark, NJ 07066, USA.

SMART by GEP is hosted in the Microsoft Azure Cloud Platforms in Microsoft's EU datacentres in Ireland and the Netherlands. Microsoft Azure datacentres are certified for control requirements for SSAE18, ISO27001, and ISO22301. The involvement of third parties during collection and processing of personal information undergoes due diligence to ensure compliance with the policy and regulatory requirements.

### 9. For how long are my personal data stored?

Your personal data are stored for at least as long as is necessary for the purposes for which they were collected. Records related to your persona which are handled by EGP are part of the "Supply management records" and "EGP contract records".

Record Type	Record Subtype	Record Description	Retention Start	Electronic Archiving Period (years)	Physical Archiving Period (years)
Supply management records	RFx records	Records of Requests for Information or Quotation or Proposal (RFx) done in EGP	Next calendar year after record is closed or archived by EGP	12	N/A
Supply management records	Tender evaluation records	Records of all tender evaluations done in EGP	Next calendar year after record is closed or archived by EGP	12	N/A
Supply management records	eAuction records	Records of all eAuctions done in EGP	Next calendar year after record is closed or archived by EGP	12	N/A
Supply management records	SAQ records	Records of all Supplier Audit Questionnaires (SAQs)	Next calendar year after record is closed or archived by EGP	12	N/A
Supply management records	SSS records	Records of all Supplier Sustainability Scorecards (SSSs)	Next calendar year after record is closed or archived by EGP	12	N/A
EGP contract records	Third party contracts	Records of third party contract metadata and scanned documents	Next calendar year after inactive date	13	10

EGP contract records	SLA	Records of Service Level Agreements (SLAs) with metadata and scanned documents	Next calendar year after inactive date	13	10
Customer contract records	Third party contracts	Records of customers' third party contracts electronically stored in EGP	Next calendar year after inactive date	13	N/A
Customer contract records	SLA	Records of customers' SLAs electronically stored in EGP	Next calendar year after inactive date	13	N/A
Supply management records	Identification document of natural person	Records of identification documents electronically stored in EGP	Next calendar year after last participation in Tender proceeding	3	N/A

Where natural person is participating in tender proceeding conducted by EGP, data processed based on the consent given shall be retained for 3 (three) years starting from when that natural person last participated in the tender proceeding conducted by EGP. i.e. if you haven't participated or haven't been invited to any tender proceeding for 3 (three) years, personal data processed based on your consent shall be deleted.

NB Ventures, Inc. (doing business as GEP), as EGP's service provider and data processor (see Item 8), retains the collected data. When the contract concluded between EGP and GEP ends, all the data collected by GEP will be returned to EGP and deleted from GEP systems. (The initial contract term will expire in 2027.)

Apart from that, the period for which data must be stored is legally prescribed. These storage obligations may exist if you cease to be registered as a supplier.

## 10. What are my rights?

The GDPR grants you the following rights over your personal data.

- Access according to GDPR article 15.
- Rectification according to GDPR article 16.
- Erasure according to GDPR article 17.
- Restriction of processing according to GDPR article 18.
- Data portability according to GDPR article 20.
- Objection according to GDPR article 21.
- Decisions that are not exclusively based on automated processing, including profiling, according to GDPR article 22.

Whichever right you wish to assert, please submit your request, preferably in one of these two ways.

- By letter, signed by you and sent to:  
Procurement Services GmbH  
Am Belvedere 1,  
1100 Vienna
- By e-mail, ideally with your qualified electronic signature, sent to:  
<mailto:Gdpr.egp@erstegroup.com>

We ask you to understand that in cases of doubt, we will request more information about your identity. This also benefits your protection, to prevent unauthorised persons from accessing your data.

If you do not receive a timely answer to an application, or if in your opinion we have not handled your application legitimately, or if you think that your right to data protection has been violated, you may complain to the responsible supervisory authority:

**Austrian Data Protection Authority**

Barichgasse 40-42, 1030 Vienna

<https://www.dsb.gv.at>