

## Information on Data Protection and Data Processing

This document provides important information, in a summarised form, about the protection of your personal data. Its content is governed 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 point for requests about data protection:

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

### 2. What personal data are processed and where do they come from?

We process the following personal data.

- Master and legitimization data (e.g., first name, last name, business contact information, business address, other contact data).
- Metadata: 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. What are the purposes and the legal bases for the data processing?

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.

### 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 on the basis of consent

If there is neither a contract nor a legal obligation or legitimate interest, data processing may still be legitimate: i.e., in cases in which you have given us your consent or approval. 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. Are any data processed which were not obtained from me?

Most of the personal data we process about you was provided by you. However, we may also obtain data about you from other sources, as shown below.

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 increasing 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 consent, we may unfortunately be unable to enter into a business relationship.

If we are only allowed to process your data based on your consent, you are not obliged to grant such consent or to provide the data.

In case you wish to participate as a natural person in the tender proceedings managed by EGP, in order 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 into a business relationship.

Separate consent shall be provided by the natural person that wish to be registered in order 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. Who are the recipients of my personal data?

Your personal data may be transmitted to departments and persons (employees and vicarious agents) within Erste Bank and Erste Group Bank AG who need these data for the contractual or legal performance of duties, and for the protection of legitimate interests.

The data collected is shared with the following entities:

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 GesmbH	CS NHQ, s.r.o.	ERSTE BEFEKTETESI Zrt	BCR Banca pentru Locuinte SA	Erste & Steiermaerkische s-Leasing	Asset Management Slovenskej sporitelne, spravcovska spolocnost, a.s.
Erste Asset Management GmbH (EAM Group)	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	
Erste Bank und Sparkassen Leasing GmbH	Leasing České spořitelny, a.s.	Erste Lakas-Takarekpenztar Zártkörűen Működő Részvénytársaság	BCR Pensii, SOCIETATE DE ADMINISTRARE A FONDURILOR DE PENSII PRIVATE S.A.	Erste Card Club d.o.o.	
Erste Campus Mobilien GmbH & CO KG	Erste Group Shared Services s.r.o.	Erste Asset Management Ltd	SUPPORT COLECT SRL	ERSTE CARD SI	
Erste Campus Immobilien GmbH & CO KG	Factoring Ceske sporitelny, a.s.	Procurement Services HU Ltd.	BCR Payment Services SRL	ERSTE d.o.o. - društvo za upravljanje obveznim mirovinskim fondom	
Erste Group Bank AG	Česká spořitelna - penzijní společnost, a.s.		good.bee credit I.F.N. S.A.	Erste Group Card Processor d.o.o.	
Erste Digital GmbH	REICO Investiční společnost České spořitelny, a.s.		SAI Erste Asset Management S.A.	Erste Group IT HR d.o.o.	
Erste Group Services	Stavební sporitelna České spořitelny, a.s.		Procurement Services RO srl	ERSTE NEKRETNINE d.o.o. za poslovanje nekretninama	
IMMORENT Gruppe	Erste Asset Management GmbH, pobočka Česká republika			s-Leasing Beograd/Serbia	
Intermarket Bank AG	ČS Seed Starter, a.s.			S-RENT d.o.o. Beograd	

Mundo FM&S GesmbH	Procurement Services CZ s.r.o			Erste Asset Management d.o.o.	
OM Objektmanagement GmbH				Procurement Services HR d.o.o.	
s REAL Immobilienvermittlung GmbH					
s ServiceCenter GmbH					
s Wohnfinanzierung Beratungs GmbH					
Salzburger Sparkasse Bankaktiengesellschaft					
sDG Dienstleistungsgesellschaft mbH					
Sparkasse Hainburg-Bruck-Neusiedl AG					
Tiroler Sparkasse Bank AG					
Erste Asset Management GmbH					
Erste Sparinvest Kapitalanlagegesellschaft m.b.H.					
Erste Immobilien Kapitalanlagegesellschaft m.b.H.					
RINGTUM Kapitalanlagegesellschaft m.b.H					
Procurement Services GmbH					

Your personal data may also be transmitted to the following bodies.

- 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.

The data may also be transmitted to other third parties if you have consented to the transmission.

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

Our processors may co-operate with sub-processors in third countries. (Currently this is not done.) If there is no adequate level of data protection, the data transfer will take place based on standard contractual clauses or other appropriate safeguards.

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 rights do I have?

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 apply to us, 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 give only authorised persons access to our 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

Telephone: 01/52 152-0

Email: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

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