

## **Privacy notice according to Art. 13, 14 GDPR: Procure for Knauf (P4K)**

Creating new things, preserving values, shaping the future. As a leading supplier of building materials and construction systems, Gebr. Knauf KG and its affiliates (jointly the “Knauf Group” or “we”) faces up to its responsibility for sustainable, resource-conserving construction, modernization, and renovation. We also place the highest value on protecting your personal data. That's why we respect your privacy and want you to be able to trust us when it comes to data protection just as you do when it comes to construction. We therefore want to inform you transparently about the purposes for which we process your data and whether or how long we store it. With the following information, we would like to give you an overview of the processing of your personal data as an employee of a prospective, active and former Knauf supplier.

### **I. Name and address of the controller**

The controller within the meaning of the General Data Protection Regulation (GDPR) and other data protection regulations is:

Knauf Gips KG  
Am Bahnhof 7  
97346 Iphofen

Telefon: 09323 / 31-0  
Telefax: 09323 / 31-277

E-Mail: [procurement@knauf.com](mailto:procurement@knauf.com)

If different Knauf Companies act as joint controllers, Knauf Gips KG is designated as a single point of contact for data subjects under the GDPR (also see chapter V.)

### **Data protection officer Knauf Group**

Am Bahnhof 7 97346 Iphofen Germany Phone: + 49 9323 / 31-0 Email: [data-protection@knauf.com](mailto:data-protection@knauf.com)

### **II. General information on data processing**

#### **Scope of processing of personal data**

We process your personal data in principle only insofar as this is required to facilitate various procurement activities such as sourcing, purchasing, contract management, and supplier management.

### **III. Types and sources of processed personal data**

As a rule, this data is as follows:

- First Name, Last Name, Salutation, Title,
- Email-Address, Username

- Telephone Number, Mobile Number
- Address of Supplier
- Main language, permission settings
- Avatar, initials, photo (optional)
- Additional information (personal data) that you might share with us

We receive your personal information through these channels:

- Jaggaer Austria GmbH
- SAP Knauf

#### IV. Legal basis and purposes for processing personal data

##### *Consent*

Insofar as we obtain the consent of the data subject for processing personal data, Article 6 (1) (1) (a) GDPR shall serve as the legal basis. You can withdraw your consent at any time with effect for the future. The lawfulness of the data processing carried out up to that point is not affected by the withdrawal.

##### *Performance of a contract or precontractual measures*

For processing personal data, which is required for the performance of a contract to which the data subject is party, Article 6 (1) (1) (b) GDPR, § 26 (1) BDSG (so far applicable) shall serve as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures.

This includes in particular the communication with you.

##### *Legal obligation*

If processing of personal data is necessary for compliance with a legal obligation, Article 6 (1) (1) (c) GDPR shall serve as the legal basis.

##### *Legitimate interest*

If processing is necessary for protecting the legitimate interests of our company or a third party, for example, the defense or enforcement of legal claims, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, Article 6 (1) (1) (f) GDPR shall serve as the legal basis.

##### *Special categories of personal data*

Special categories of personal data pursuant to Art. 9 (1) GDPR are only processed if we have your consent or if one of the provisions of Art. 9 (2) GDPR is fulfilled.

##### *§ 25 TTDSG*

We also base some data processing on § 25 (1) TTDSG if we store information on your terminal device or access information that is already stored in your terminal device (e.g., cookies, browser fingerprints, MAC addresses). For this we usually obtain your consent, § 25 (1) TTDSG. You can withdraw your consent at any time. If we only access or store information in your terminal device to transmit a message via a public telecommunications network or if this is absolutely necessary so that we can provide a telemedia service expressly requested by you pursuant to § 25 (2) (1) and (2) TTDSG, we do not require your consent.

#### **Data deletion and period of storage**

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage no longer applies. Storage is also permissible if this has been provided for under European or national law in EU ordinances, laws, or other regulations to which the controller is subject. Blocking or deletion of the data takes place even when a retention period prescribed by the mentioned norms expires unless further retention of the data is necessary for the closing of a contract or for fulfilling a contractual obligation.

## **V. Transfer of personal data**

Your personal data will be passed on to the following recipients:

- a) if it is necessary for the clarification or prosecution of illegal or abusive incidents, to our legal advisors, the law enforcement authorities and, if applicable, to injured third parties – however, this only happens if there are concrete indications of illegal or abusive behavior;
- b) upon request to certain public authorities to whom we are obliged to provide information, such as law enforcement agencies, authorities that prosecute administrative offenses subject to fines and the tax authorities;
- c) occasionally, we rely on contractually affiliated third-party companies and external service providers to fulfill the purposes described in this data privacy statement, such as logistics companies, service providers, business consultants. In such cases, information is passed on to these companies or individuals to enable them to continue processing. For example, we use subprocessors like Knauf Information Services GmbH and Jaggaer Austria GmbH to support with provisioning our supplier management platform.
- d) as our business evolves, we may change the structure of our company by changing its legal form, establishing, buying or selling subsidiaries, divisions or components. In such transactions, the relevant employee information will be shared with the part of the company being transferred. For any transfer of personal data to third parties to the extent described above, we will ensure that this is done in accordance with this privacy notice and the relevant data privacy laws;
- e) the data may also be transferred to other companies that use the tool “Jaggaer” within the Knauf Group that act as Joint Controllers according to Art. 26 GDPR. Details of these companies can be found here: <https://knauf.com/en/knauf-worldwide>.

The Knauf Partner Companies follow a strict framework to manage access rights and ensure your rights as a data subject are respected. The purpose of the data processing under joint control by Knauf Partner Companies is to pursue the legitimate interest according to Art. 6 (1)(f) GDPR of having supplier-related data in one place in order to structure business data, keep it updated to avoid old, false, or incorrect data, ensure efficient and effective supply chain management, and support supplier management, demand consolidation and development.

In this context, the Knauf Partner Companies using Jaggaer are recipients of supplier data. As part of their joint controllership under data protection law, the Knauf Partner Companies have agreed which of them will fulfill which obligations under the GDPR. Under this agreement, we are responsible for collecting your data and providing information as required by Articles 13 and 14 GDPR regarding the collection of your personal data. The Knauf Partner Companies will notify one another without undue delay in the event that rights are being asserted by data subjects. They will provide one another with all the information necessary for responding to information requests. You may exercise your rights under data protection law against any Knauf Partner Company using Jaggaer. You will receive information from the party against which the rights were asserted.

Your personal information will only be disclosed to affiliates and service partners, if they act on our behalf and assist us in providing our services. Processing of your personal data by service providers commissioned by us takes place within the scope of a processing on behalf acc. to Art. 28 GDPR.

The forementioned service providers only has access to personal information required to perform the respective activity. They are prohibited from using personal information for other, for their own advertising purposes. The recipients are carefully selected by us and regularly checked to ensure that your data is only used for the purposes specified by us and in accordance with applicable data protection laws. Insofar as external service providers come into contact with personal data, we have ensured through legal, technical and organizational measures as well as through regular inspections that these too comply with the applicable data protection regulations.

There is no transfer of your personal data to third parties for purposes other than those listed.

## **VI. Transfer of personal data to third countries**

In this context, we transfer personal data to the third countries listed above. To ensure an adequate level of data protection in these third countries either adequacy decisions of the EU Commission or adequate and appropriate guarantees exist in the form of standard data protection clauses of the Commission (EU standard contract clauses).

Jaggaer Austria GmbH, acting as a subprocessor, may process data in third countries outside the European Economic Area (EEA). To ensure the protection of personal data during such transfers, Jaggaer implements several safeguards. Jaggaer employs Standard Contractual Clauses (SCCs) as approved by the European Commission to ensure that any data transferred outside the EEA is afforded the same level of protection as within the EEA. Jaggaer conducts Transfer Impact Assessments (TIAs) to evaluate the legal and regulatory landscape of the third countries, ensuring that the data protection measures in place are robust and effective. More information on how Jaggaer processes data (including cookies) can be found in their data privacy policy:

<https://www.jaggaer.com/service-privacy-policy>

## **VII. Provision of the system and creation of log files**

Every time our system is accessed, our system automatically records information transmitted to us by the computer system of the accessing computer.

The following data is collected:

- Information about the browser type and version used
- Your operating system
- Your IP address
- The URL you're accessing the career site from
- Session data (i.e., session tokens, language theme, dashboard access cache)
- Host name of accessing computer
- Date and time of server request
- Your unique device ID

This data is saved in log files on our system. It is not saved together with other personal data from you.

The temporary storage of the IP address by the system is necessary in order to enable delivery of the system to your computer. Your IP address must remain saved for the duration of the session. The data is stored in log files to ensure a smooth connection setup of the website and a comfortable use of our website and to ensure the functionality of the system. In addition, we use the data to optimize our system and to ensure the security of our information technology systems. The data is not evaluated in this context for marketing purposes.

Article 6 (1) (1) (f) GDPR represents the legal basis for the temporary storage of data and log files.

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected.

## VIII. Use of cookies

Our platform uses cookies. Cookies are text files that are saved in or by the web browser on your computer system. When you access our platform, a cookie may be saved on your operating system. This cookie contains a characteristic sequence of characters, which enables unique identification of the browser when the website is accessed again.

We use cookies to make our platform more user friendly. Some elements of our system require that the accessing browser can still be identified after switching to a different page.

- **Technical cookies:** are those used for the sole purpose of carrying out the transmission of certain information or that are essential for you to browse the website and use its features, such as accessing secure areas of the website. The website may use the following types of technical cookies:
- **Session Cookies:** contains information that is stored in a temporary memory location and then subsequently deleted after the session is completed or the web browser is closed
- **Security Cookies:** used to authenticate users and prevent security risks.
- **Preferences cookies:** Also known as “functionality cookies,” these are used to remember choices you have made in the past, like what language you prefer, what region you would like weather reports for, or what your username and password are so you can automatically log in. None of this information can be used to identify you.
- **Statistics cookies:** Also known as “performance cookies,” these cookies collect information about how you use our platform, like which pages you visited and which links you clicked on. None of this information can be used to identify you. It is all aggregated and anonymized. The sole purpose of these cookies is to our website and user experience. This may include cookies from third-party.

Article 6 (1)(1) (a) GDPR serves as the legal basis for processing personal data using cookies that are not technically necessary.

Article 6 (1) (1) (f) GDPR serves as the legal basis for processing personal data using technically necessary cookies.

We also base the use of cookies on § 25 (1) TTDSG, if you have consented to the use of cookies. You can revoke your consent at any time. If we only access or store information in your terminal device to transmit a message via a public telecommunications network or if this is absolutely necessary so that we can provide a telemedia service expressly requested by you pursuant to § 25 (2) (1) and (2) TTDSG, we do not require your consent.

Cookies are saved on the user’s computer and transferred from there to our website. As a user, this means that you also have full control of the use of cookies. By changing the settings in your web browser, you can deactivate or limit the transfer of cookies.

Previously saved cookies can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, there is a possibility that not all functions of the website can continue to be used fully.

The respective storage period of the cookies can be found in our cookie banner.

## **IX. Rights of the data subject**

If your personal data is processed, you are the data subject within the meaning of the GDPR and may invoke the following rights with respect to the controller:

### **Right of access (Article 15 GDPR)**

You have the right to request information about your personal data processed by us. This right of access includes information about

- the purposes of processing
- the categories of personal data
- the recipients or categories of recipients to whom your data have been or will be disclosed
- the planned storage period or at least the criteria for determining the storage period
- the existence of a right to rectification, erasure, restriction of processing or objection
- the existence of a right of appeal to a supervisory authority
- the origin of your personal data, if it was not collected by us
- the existence of automated decision-making, including profiling, and, if applicable, meaningful information about its details

### **Right to rectification (Art. 16 GDPR)**

You have the right to promptly correct any inaccurate or incomplete personal data stored by us.

### **Right to erasure (Art. 17 GDPR)**

You also have the right to request that we delete your personal data without delay, unless further processing is necessary for one of the following reasons:

- the personal data are still necessary for the purposes for which they were collected or otherwise processed
- to exercise the right to freedom of expression and information
- for compliance with a legal obligation which requires processing under the law of the European Union or the Member States to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- for reasons of public interest in the area of public health in accordance with Art. 9(2) h) and (i) and Art. 9(3) GDPR
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Art. 89(1) GDPR, insofar as the right referred to in section a) is likely to render impossible or seriously prejudice the achievement of the purposes of such processing
- for the assertion, exercise, or defense of legal claims

### **Right to restriction of processing (Art. 18 GDPR)**

You may request the restriction of the processing of your personal data for one of the following reasons:

- You dispute the accuracy of your personal data.
- The processing is unlawful, and you object to the erasure of the personal data.
- We no longer need the personal data for the purposes of processing, but you need it to assert, exercise or defend legal claims.
- You object to the processing pursuant to Article 21 (1) GDPR.

## **Notification**

If you have requested the rectification or erasure of your personal data or a restriction of processing in accordance with Art. 16, Art. 17 or Art. 18 GDPR, we will inform all recipients to whom your personal data has been disclosed, unless this proves impossible or involves a disproportionate effort. You may request that we inform you of these recipients.

## **Transmission**

You have the right to receive your personal data that you have provided to us in a structured, common, and machine-readable format.

You also have the right to request the transfer of this data to a third party, provided that the processing was carried out with the help of automated processes and is based on consent pursuant to Art. 6. (1) (1) a) or Art. 9 (2) a) or on a contract pursuant to Art. 6 (1) (1) b) GDPR.

## **Right to data portability (Art. 20 GDPR)**

Data subjects have the right to request that their data be transferred to or made available to another controller. The data must be provided in a machine-readable electronic format. The right to data portability shall not apply to the processing of personal data that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

## **Right to object (Art. 21 GDPR)**

If your personal data is processed based on legitimate interests pursuant to Art. 6 (1) (1) f) GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are grounds for doing so that arise from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right of objection, which will be implemented by us without specifying the situation. If you would like to exercise your right of revocation or objection, it is sufficient to send an e-mail to [procurement@knauf.com](mailto:procurement@knauf.com)

## **Right to object to automated processing (Art. 22 GDPR)**

You have the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision

- is necessary for the conclusion or performance of a contract between you and us
- is permissible on the basis of legal provisions of the European Union or the Member States to which we are subject, and these legal provisions contain appropriate measures to safeguard your rights and freedoms as well as your legitimate interests
- is made with your express consent
- However, these decisions must not be based on special categories of personal data pursuant to Art. 9(1) GDPR, unless Article 9(2)a) or g) GDPR applies, and appropriate measures have been taken to protect your rights and freedoms and your legitimate interests.

With regard to the cases mentioned in 1. and 3. above, we take appropriate measures to safeguard the rights and freedoms as well as your legitimate interests, which include at least the right to obtain the intervention of a person from our side, to express your point of view and to contest the decision.

### **Right to withdrawal of data protection consent (Art. 7 (3) GDPR)**

In accordance with Art. 7 (3) GDPR, you have the right to revoke your consent at any time. The revocation of consent does not affect the lawfulness of the processing carried out based on the consent until the revocation. In the future, we may no longer continue the data processing that was based on your revoked consent.

### **Complaint, Art. 77 GDPR**

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the GDPR.

### **X. Changes**

We have the right to change or add to this Privacy Notice. The latest version of the Privacy Notice will always be available in the Knauf Supplier Portal <https://knauf.com/de/einkauf>  
The date at the top of this Privacy Notice indicates when it was last updated.