

# PROCESSING OF PERSONAL DATA FOR THE BUSINESS PARTNERS

## NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE BUSINESS PARTNERS

The business partners of the company BIOTERA a company for handling organic waste, d.o.o., Poslovna cona Žeje pri Komenda, Pod kostanji 4, 1218 Komenda (hereinafter: **BIOTERA** ), as well as entities participating in the optional procedure before the establishment of a contractual relationship and before the tender procedure ( hereinafter: business partners ) in connection with the planned business relationship with the company BIOTERA , we inform you that their personal data, which is necessary for the implementation of the due diligence process regarding the detection of any form of corruption (hereinafter : care of customer review), processed in the manner described in this notice.

BIOTERA is committed to protecting the personal data of its business partners and is aware that it is important to respect the right of business partners to self-determination regarding information, therefore it treats personal data confidentially and implements the necessary security, technical and organizational measures to ensure the security of personal data.

### Controller of personal data:

- BIOTERA, doo, PC Žeje pri Komenda, Pod kostanji 4, 1218 Komenda, registration number: 1810065000, tax number: 97520420, telephone number: + 386 1 721 20 09, e-mail address: biotera@veolia.com

### Authorized person for data protection:

- Urška Sušnik Pivk, telephone number: + 386 41 787 515, e-mail address: urska.susnik-pivk@veolia.com

**Scope of personal data processed:** in the customer due diligence process, BIOTERA asks business partners to fill out a so-called customer due diligence questionnaire, which, depending on the business partner, may contain the following personal data:

- if the business partner is a natural person: first and last name, address of permanent and temporary residence, tax number, place and date of birth, citizenship and number, type, date of issue, date of termination and title of the issuer of the official identity document;
- if the business partner is a legal entity: position, name and surname, address of permanent and temporary residence, tax number, place and date of birth, citizenship and number, type, date of issue, date of termination and title of the issuer of the official identity document, e-mail address of the representative legal entities; name and surname, address of permanent and temporary residence, date of birth, citizenship, tax number and amount of ownership share or other way of controlling the actual owners of the business partner;

- name and surname of the head of sales, compliance/ corporate responsibility (*Corporate Social Responsibility* or "CSR"), telephone number, email address;
- first and last name and address of permanent and temporary residence of the natural person designated by the business partner as his reference;
- first and last name, address of permanent and temporary residence, place and date of birth, tax number, citizenship and number, type and title of the issuer of the official identity document the owners or managers of the business partner, who may be related to corruption, fraud, unfair or similar breaches of obligations, official investigation, criminal proceedings or determination of criminal responsibility, if the business partner indicates them in the questionnaire;
- first and last name, address of permanent and temporary residence, place and date of birth, tax number, citizenship and number, type and title of the issuer of the official identity document the director, members of the board or supervisory board of the business partner or members with the authority to represent, decide or supervise these boards, who may be related to the assessment of corruption, if the business partner states it in the questionnaire;
- information on whether the business partner – a natural person or a legal representative or the actual owner of the business partner – is a legal entity that the business partner states in the questionnaire as a Politically Exposed Person (*PEP*).

**Purpose and legal basis:** BIOTERA uses the above-mentioned personal data included in the customer due diligence questionnaire, as well as any additional personal data provided by the business partner in the customer due diligence process, based on point (c) of the first paragraph of 6. of Article Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in the processing of personal data and on the free flow of such data and the repeal of Directive 95/46/EC - General Data Protection Regulation (hereinafter: GDPR) – fulfilling the legal obligation from Article 20 ZPPDFT-2 in conjunction with Article 150 ZPPDFT-2. In this case, the processing of personal data is carried out exclusively for the purpose of carrying out the customer due diligence process. The purpose of the customer due diligence procedure is to make sure of the business partner's business ethics, to conduct a reasonable and proportionate investigation of the business partner, considering the activities carried out by the business partner and the associated corruption risk assessment. Data processing is strictly confidential. Access to personal data is permitted only to persons for whom familiarization with personal data is absolutely necessary for the performance of their task or the work for which they are authorized.

The disclosure of false information by the business partner when answering questions from the business partner due diligence questionnaire or the concealment of essential information may lead to exclusion from the selection process or to the termination of the contract if this becomes known after the conclusion of the contractual relationship. In view of this, in order to conclude a contract between BIOTERA and the relevant business partner and to maintain the contractual relationship, it is necessary to carry out a customer due diligence process and to process related personal data, which is necessary for the implementation of this process by BIOTERA as a data controller.

**Data retention period:** personal data will be kept by the administrator for ten years after the end of the business relationship with the business partner unless the law provides for a longer retention period. In the case of the retention of data obtained within the framework of a business relationship and the associated documentation, the retention period for all acquired data, including data on individual transactions, begins on the first day after the termination of the business relationship. After this period has expired, the controller will delete the personal data without undue delay - due to

technical reasons - within 30 days at the latest.

**Beneficiaries of access to data:** persons who have the authority to decide on the conclusion of a given contract.

**Users and categories of users:** We do not disclose your personal data to anyone, except to competent persons within the operator. Your personal data may be forwarded to the following users or categories of users: Veolia Energia Magyarország Zrt ., with its registered office at 2040 Budaörs, Szabadság út 301, Hungary, other companies in the Veolia Hungary group of companies. We undertake not to pass on your personal data to unauthorized third parties without your consent, unless otherwise required by applicable law. Contract processors can process confidential data exclusively on our behalf and within the limits of our authorization (in a written contract or other legal act). We undertake that neither we nor other users will forward or transfer your personal data to a third country outside the European Union and/or the European Economic Area or to an international organization without an appropriate level of protection.

In such cases, personal data may be processed only for the purposes stated in this notice, using the necessary security, technical and organizational measures to ensure the security of personal data.

**Data security:** The data controller selects and manages the IT tools used to process personal data so that there is adequate data security. The data controller uses appropriate measures to protect personal data, in particular against unauthorized access, modification, transfer, disclosure, deletion or destruction, as well as against accidental destruction, damage and inaccessibility due to changes in the technology used.

**Rights of individuals to whom personal data relates:** The individual to whom personal data relates can request information about the processing of his personal data, access to personal data, and request correction of his personal data, as well as - with the exception of mandatory data processing - deletion and withdrawal, may exercise their right to data portability and to object, may request restriction of data processing in the manner indicated at the time of data collection or to the contact details of the data controller.

The content of the rights of individuals to whom personal data refer:

- Right to be informed, right to access - based on Articles 13, 14 and 15 of the GDPR, you have the right to receive information about your personal data that we process, and you also have the right to access this data. During access, the data subject will be provided with a copy of the personal data, whereby the data controller may charge additional requested copies (based on administrative costs and in a reasonable amount).
- Right to rectification - you have the right to request a change or update of your personal data after 16. Article GDPR, if the data is inaccurate or incomplete.
- Right to erasure - based on 17. Article GDPR, you have the right to request the deletion of your personal data under certain conditions.
- Right to restriction of processing - based on 18. Article GDPR, in certain cases you have the right to request that we temporarily or permanently limit the processing of all or part of your personal data.
- The right to opt-out from a decision made based on automated decision-making - based on 22. Article GDPR, you have the right to opt out of a decision made solely based on automated decision-making, including profiling, during which the decision made would have a legal effect on you or have a similar significant effect.

The data controller shall provide the data subject with information without undue delay and in any case within one month of receiving the request. If necessary, this deadline can be extended by a maximum of two additional months, considering the complexity and number of requests. The administrator shall inform the data subject of any such extension within one month of receipt of the request together with the reasons for the delay. When a data subject submits a request by electronic means, the information shall be provided by electronic means whenever possible, unless the data subject requests otherwise.

If the controller does not act on the request of the individual to whom the personal data relates, without delay, and at the latest within one month after receiving the request, informs about the reasons for not taking action, as well as that the individual to whom the personal data relates can file a complaint with the authorized person for data protection of the controller, with the supervisory authority and the possibility of exercising legal remedies.

**The right to appeal to the authorized person for data protection** (e-mail address: [urska.susnik-pivk@veolia.com](mailto:urska.susnik-pivk@veolia.com) ).

**The right to complain to the supervisory authority:** You can submit a complaint to the Information Commissioner (address: Dunajska 22, 1000 Ljubljana, e-mail address: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si) phone: 012309730, website: [www.ip-rs.si](http://www.ip-rs.si)).

**Additional information:** Our information systems and the information systems of our contractual processors are protected by technical and organizational measures against accidental or illegal access, modification, disclosure, or dissemination of your personal data by unauthorized persons and against accidental or illegal loss and destruction of personal data.

Based on the provided personal data, we do not make automated decisions, including the creation of profiles.

**Changes and contact:** For questions about the confidentiality of your data, the method of data collection and processing, or to exercise your rights, please contact the controller, BIOTERA, doo, PC Žeje pri Komenda, Pod kostanji 4, 1218 Komenda, registration number: 1810065000, tax number: 97520420, telephone number: + 386 1 721 20 09, e-mail address: [biotera@veolia.com](mailto:biotera@veolia.com)

We will process your questions without undue delay and free of charge, in accordance with legal requirements, and let you know what measures we have taken.

If your personal data changes (e.g. identification data, contact data or email address), please inform us of the changes.

If necessary, the subject information can be adapted from time to time to the actual situation and legislation in the field of personal data protection.

Updated: December 2023  
BIOTERA, doo