



# **AQUANIMA PRIVACY POLICY**

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## **I. INTRODUCTION**

Within the scope of its operations, Aqunima Group (companies that are a part of Aqunima as detailed below) makes available the Aqunima Supplier Portal to any of its suppliers which may be interested. The Portal enables suppliers to engage in the negotiation, contract arrangement and certification processes for Aqunima customers or Aqunima itself ("the Platform").

The Platform is managed by IBÉRICA DE COMPRAS CORPORATIVAS, S.L. ("Aqunima Spain"), it is a global Platform and, as such, any of the companies in Aqunima Group across the world may access its content and address any supplier to fulfil its duties.

Suppliers must register before they can use the Platform. During the registration process suppliers must provide certain information, such as some personal data of the suppliers' representatives if they are a legal entity or of the natural person if they are a self-employed professional ("the data subjects").

Aqunima Group is committed to data protection. It enforces all applicable regulations of the country of residence of the data subjects and the processing entities as well as the highest data protection standards. To this end, it has implemented the appropriate technical and organisational measures to ensure an appropriate level of security and to avoid the loss, incorrect use, alteration, unauthorised access and theft of the information and data provided. Likewise, Aqunima Group guarantees that it complies with the duty of secrecy and confidentiality with respect to the data and information provided through the Platform's supplier registration form.

The data subjects must provide the requested personal data through the Platform so the suppliers can use the features offered by Aqunima Group through the Platform.

## II.- Data controllers and contact details

The companies below, which make up Aquanima Group, are joint controllers.

### List of joint controllers:

<b>TRADE NAME</b>	<b>CORPORATE NAME</b>	<b>INFORMATION AND CONTACT DETAILS</b>
AQUANIMA SPAIN	Ibérica de Compras Corporativas, S.L.	<ul style="list-style-type: none"> <li>- Tax no. (NIF): B-82797713</li> <li>- Avda. de Cantabria s/n, edificio Arrecife, Planta 0, 28660 – Boadilla del Monte, Madrid</li> <li>- gestion.gdpr@aquanima.com</li> </ul>
AQUANIMA GERMANY	Ibérica De Compras Corporativas, S.L. Niederlassung Deutschland	<ul style="list-style-type: none"> <li>- Tax no.: 121/5948/1417 NIF: DE278751209</li> <li>- Santander Platz, 1, 41061 Mönchengladbach, Germany</li> <li>- gestion.gdpr@aquanima.com</li> </ul>
AQUANIMA UNITED KINGDOM	Ibérica De Compras Corporativas, S.L. UK Branch	<ul style="list-style-type: none"> <li>- Oversea Company Reg, No. FC026626, Branch No. BR008678</li> <li>- Santander House 201 Grafton Gate East, Milton Keynes, MK9 1AN, United Kingdom</li> <li>- gestion.gdpr@aquanima.com</li> </ul>
AQUANIMA PORTUGAL	Ibérica de Compras Corporativas S.L., Sucursal em Portugal	<ul style="list-style-type: none"> <li>- Tax no. (NIF): 980435226</li> <li>- Rua da Mesquita, nº 6, 1070-238, Lisbon</li> <li>- gestion.gdpr@aquanima.com</li> </ul>
AQUANIMA BRAZIL	Aquanima Brasil, Ltda	<ul style="list-style-type: none"> <li>- Tax no. (CNPJ/MF): 03.726.934/0001-01</li> <li>- Avenida Roque Petroni Junior, nº 999, 11º andar, Vila Gertrudes, São Paulo, Estado de São Paulo</li> <li>- gestion.gdpr@aquanima.com</li> </ul>
AQUANIMA CHILE	Aquanima Chile, S.A.	<ul style="list-style-type: none"> <li>- Tax no. (RUT): 96.982.090-0</li> <li>- Alcántara 200, Las Condes, Santiago de Chile</li> </ul>

TRADE NAME	CORPORATE NAME	INFORMATION AND CONTACT DETAILS
		- gestion.gdpr@aquanima.com
AQUANIMA MEXICO	Aquanima México S. de R.L. de C.V.	- Tax no. (RFC): AME001011JS3 - Av. Vasco de Quiroga No. 3900 Torre A, piso 18 A. Col. Santa Fe Cuajimalpa Cuajimalpa de Morelos Ciudad de México C.P. 05438 - gestion.gdpr@aquanima.com
AQUANIMA UNITED STATES	NW Services, Co.	- Federal Tax ID: 65-1124801 - 7640 SW 164th Place Miami, FL 33193 - gestion.gdpr@aquanima.com
AQUANIMA ARGENTINA	Aquanima, S.A.	- Tax no. (CUIT): 30710488165 - Av. Juan de Garay 151, CABA, Argentina - gestion.gdpr@aquanima.com

### III.- Purpose of personal data processing and legitimate interests

This section explains which types of processing are carried out by all joint controllers, their purposes and their legal ground.

1. **Registering the supplier on the Platform:** the joint controllers will use the personal data of data subjects who act as representatives of the supplier to carry out whatever steps are necessary to register the supplier on the Platform and to manage and address any doubts, questions and suggestions that the data subjects may raise in relation to the services provided by Aquanima. The legitimate basis of this processing is the performance of a contract.
2. **Procedure for registering a supplier-authorized user to use the Platform:** the joint controllers will use the personal data of administrator users from the supplier's profile to enable access to the Platform's tools arranged by the supplier. The legitimate basis of this processing is the performance of a contract.

3. **Managing the process for certifying, negotiating and entering into a contract with the suppliers:** the joint controllers may use the data provided by the data subjects to establish a contact in relation to the certification and/or negotiation and/or formalisation of contractual documents, as well as to keep them informed about any progress in relation to said processes. The legitimate basis of this processing is the performance of a contract.
4. **Aquanima tools management and support:** the joint controllers may use the data provided by the data subjects to manage and provide support to the supplier concerning the use of the features offered through Aquanima. The legitimate basis of this processing is the performance of a contract.
5. **Voice recordings of the data subjects for support purposes:** the joint controllers may record the data subjects' personal data, including "voice" data, when they have telephone conversations with any of them, and use the recordings as evidence in and out of court, if necessary. The legitimate basis of this processing is the performance of a contract.
6. **Satisfaction surveys:** the joint controllers may send surveys to supplier-authorized users asking them to rate the services provided and to measure their level of satisfaction. This processing is necessary for Aquanima's legitimate interests.
7. **Other communications:** the joint controllers may send other correspondence to supplier-authorized users with useful information relating to our customers. The legitimate basis of this processing is the legitimate interests of the parties.

#### **IV.- Data storage period**

The personal data provided will be kept (i) as long as the contractual relationship with the supplier is maintained, if applicable; (ii) until the right to erasure is requested by the data subject; and (iii) as long as it cannot be deleted because it is needed to comply with a legal obligation or for the establishment, exercise and defence of legal claims.

If the data subject exercises their right to erasure, their personal data will be kept blocked during the legally established statute of limitations to attend to the possible responsibilities arising from the processing thereof.

## **V.- Data disclosure**

As part of the development of certification and/or negotiation processes and in cases in which the joint controllers are involved in the formalization and management of contractual documents, a communication may be made of the personal data of the data subject to the Client of the joint controllers. This notification has its legal basis in the legitimate interest of both the joint controller and the Client and the company the data subject represents.

## **VI. - International data transfers**

Since some of the joint controllers are located outside the European Union and the Platform is managed from Spain, there may international data transfers as per the applicable European regulation.

Aquanima hereby informs the data subjects that data processing outside the European Union may entail a security risk for their data. Notwithstanding the foregoing, Aquanima states that it has applied the technical and organisational security measures needed to procure and guarantee the security of the data subjects' personal data. Appropriate safeguards are in place for data transfers by signing the corresponding standard contractual clauses pursuant to article 46 of the GDPR.

## **VII.- Rights of the data subjects**

Data subjects may exercise their right of access, rectification or erasure of data, as well as request that the processing of their personal data be restricted, oppose it, request the portability of their data, and to not be subject to automated individual decision-making, sending a written communication to the following email address [gestion.gdpr@aquanima.com](mailto:gestion.gdpr@aquanima.com) or by post to Avda. de Cantabria s/n, edificio Arrecife, Planta 0, 28660 - Boadilla del Monte, Madrid. The communication must be accompanied by a National Identity Document

or any other official document that evidences the identity of the data subject in question.

Without prejudice to any other administrative appeal or legal action, data subjects will be entitled to submit a complaint to the Supervisory Authority, in particular in the Member State in which they have their habitual residence, place of work or place of the alleged infringement, if they consider that their personal data was not processed in accordance with the regulations, and if their rights are not exercised. In such a case, the supervisory authority with which the complaint was filed will inform the claimant about the progress and result of the claim.

## **VIII.- Type and origin of the data**

### **1. Type**

They may include: name, surname(s), work Email, work telephone no., position held or National Identity Document.

### **2. Origin of the data**

The data subjects' data may be given to the joint controllers either directly by the data subjects or by the company they work for and represent, or by one of the clients of the joint controllers at the request of your company.

## **IX.- Consulting the agreement between the joint controllers**

As per article 26 of the General Data Protection Regulation, users may consult the essential aspects of the agreement made between the joint controllers by contacting [gestion.gdpr@aquanima.com](mailto:gestion.gdpr@aquanima.com)

 [aquanima@aquanima.com](mailto:aquanima@aquanima.com)

 [/company/aquanima](https://www.linkedin.com/company/aquanima)

 [www.aquanima.com](http://www.aquanima.com)