



## Privacy Policy for Suppliers

Ver. 4.0 – 16/07/2024

Soldo understands that your privacy is important to you and that you care about how your personal data is used.

This privacy policy aims to give you information on how Soldo collects and processes your personal data in the context of supplier and consultant relationships or when otherwise working with us as an external person.

This privacy policy applies to personal information of suppliers (including vendors) or potential suppliers who are natural persons such as self-employed persons, and representatives or contact persons of suppliers or potential suppliers who are legal entities.

### About Soldo

Soldo is made up of different legal entities.

This privacy policy is issued on behalf of the Soldo companies, so when we mention “Soldo”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant Soldo legal entity responsible for processing your personal information.

For the purposes of the European and UK data protection law, the Soldo company that you have dealings with is the controller of your personal information, for further details of which, please see the “Contact details” section below. This means that we are responsible for deciding what data is collected, how this data is going to be used and how this data is protected.

We are required under the data protections laws to notify you of the information contained in this privacy policy. It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### Contact details

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Officer at [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Financial Services Ireland DAC as follows:

Address: 33 Sir John Rogerson’s Quay, Dublin 2, D02 XK09

Email: [privacy@soldo.com](mailto:privacy@soldo.com)



You can contact Soldo Software Ltd as follows:

Address: 119 Marylebone Road, London NW1

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Soldo Financial Services Ltd as follows:

Address: 119 Marylebone Road, London NW1

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Soldo Italia Srl as follows:

Address: Via degli Olivetani 10/12, Milano

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You can contact Soldo Technology Srl as follows:

Address: Via degli Olivetani 10/12, Milano

Email: [privacy@soldo.com](mailto:privacy@soldo.com)

You have the right to make a complain to the Data Protection Authority of the state of your usual place of residence, place of work or place of the alleged infringement. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance.

## **What is personal data?**

Personal data is defined as any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

This personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **What personal data do we collect?**

We may collect information directly from you and the company with which you are working (for example, your employer).



We may also receive information from our related companies or third-party sources such as public databases or social media.

Certain personal information is required as a consequence of any contractual relationship we have with you or your company, to enable us to carry out our contractual obligations to you or your company. Failure to provide this information may prevent or delay the fulfilment of these obligations.

The information we collect may include:

- general and identification information: name, company name, department, job title, gender, email and/or postal address, mobile phone number, date of birth;
- personal data that are necessary for signing documents, including signature and authorisations;
- bank account and tax-related information where it relates to an individual, such as if you are operating as a sole trader;
- references, CV and details of individual's employment history, if collected as part of a bidding or engagement process;
- any other personal information necessary to fulfil the terms of a contract we have with you.

## **Why do we collect and use your data?**

Our purpose for collecting your personal data is so we can:

- manage our contract with you, including processing information in response to our request for quotation, signing documents, sending related information and purchase orders;
- process payments to you in accordance with our contract with you;
- keep records of the suppliers that we use. We keep and update your personal data in our suppliers database in order to contact you and/or your company when we need goods or services that you or your company can provide;
- ensure we comply with our legal obligations and internal policies;
- conduct supplier audit, including risk assessment. We process your personal data to evaluate the organizational and technical performance of your company, as well as fulfilment of agreed processes or specific standard or regulation requirements;
- conduct systems access control where we provide you with access to our IT systems;
- provide a remote access VPN and IT support to ensure secure access to and use of our resources, including collaboration tools;
- respond to and defend against legal claims.

## **The lawful basis for processing your data**

The lawful basis we rely on for processing your personal data in relation to information we collect and process as part of the contract process, including making payments to you, is that it is necessary for the performance of a contract to which you are a party.

The lawful basis we rely on for processing your personal data for accounting purposes, is our legal obligation in national law to retain certain personal data for a specified number of years.



We may also process your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: keeping records of the suppliers, performing internal and certification audits, conducting supplier audit, responding to and defending against legal claims.

### **How long do we keep your data for?**

We will keep your personal data for as long as is necessary for the purposes it was collected.

Note that retention periods vary in different jurisdictions and are set in accordance with local regulatory retention requirements.

### **Data security**

We take the security of your personal data seriously. All personal data you provide to us will be stored securely in accordance with our policies.

We put in place security measures to minimise the possibility of the loss or unauthorised access of your personal data. We restrict access of your personal data to those persons who have a business reason for knowing such information. We continuously educate and train our staff about the importance of confidentiality and privacy of customer data.

We maintain physical, electronic and procedural safeguards that comply with the relevant applicable laws and regulations, to protect your personal data from unauthorised access. We set up systems and processes to prevent unauthorised access or disclosure.

All our suppliers who process personal data for us are required to keep that data secure.

### **Data store**

Personal data is held in data centres within the European Economic Area (EEA).

### **Data sharing**

Your information may be processed by our staff or by the staff of other companies we work with to deliver our business.



The data we collect may be shared between Soldo companies or with suppliers that provide us with technology, administrative support and communication services to help us manage our relationship with you.

All the recipients of your personal data are required to take appropriate security measures to protect your personal data. They must only process your personal data for specified permitted purposes and in accordance with data protection laws.

We, or processors acting on our behalf, will only process personal data in countries outside the EEA and the UK, when we are assured, those countries provide an adequate level of data protection. In absence of an adequacy decision, transfer will be made on condition that individual's enforceable rights and effective remedies are available, and appropriate safeguards are in place.

We will share your data if we are required to do so by law, for example, by court order, or to prevent fraud or other crime.

## **Your rights**

We ensure you can exercise your rights in relation to the personal data you provide to us.

You can request access to the personal data we hold about you at any time.

You can also ask us to update your personal data if it changes or it is incomplete. In certain circumstances, you can request we erase the personal data we hold or ask us to stop or restrict processing if you have an objection.

You have the right to object to us processing your personal information based on our legitimate interest unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.

In some circumstances, you may be entitled to obtain your personal data from us in a format that makes it easier to reuse your information in another context and transmit this data to another data controller of your choosing without hindrance. This is referred to as the right to data portability. The right will only apply to the information you have provided and where it is held electronically, and where you have either consented to processing, or where processing is conducted on the basis of a contract you have with us.

If you have any privacy-related questions or unresolved problems relating to the use of your personal data, you can contact us at [privacy@soldo.com](mailto:privacy@soldo.com).

You have the right to make a complaint at any time to the relevant data protection authority. We would appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance.



### **Changes to this policy**

We may update this privacy policy from time to time. In that case the last updated date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

Last updated 16 July 2024