

Privacy Notice

For Individuals employed or engaged by Buyers and suppliers of Circular Products or Services

Effective Date 1st June 2021

INTRODUCTION

Circular Matchmakers in the Netherlands and their affiliates (“Circular Matchmakers”/“we”/“us”/“our”) provide supply chain assurance services to buyer and circular products or service supplier organisations globally. Our circular products or service supplier pre-qualification and matching services are provided using our supply chain management services (our “service”).

As an information led business, we place great importance in ensuring the quality, confidentiality, integrity and availability of the data we hold, and in meeting our data protection obligations where we process personal data. Circular Matchmakers is committed to protecting the security of your personal data and will review our Data Protection Impact Assessment (DPIA) when deemed necessary. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

This privacy notice explains what personal data Circular Matchmakers collects about individual users at both buyer and circular products or service supplier organisations (“you”/“your”) and how we use it. We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the ‘Last Updated’ date at the top

of this page. Please review this privacy notice periodically to check for updates.

PERSONAL DATA WE COLLECT

If you are employed or contracted by a circular products or service supplier organisation

We collect your personal data where your organisation has provided such personal data to us in connection with the services offered to your organisation by Circular Matchmakers (for example, an online circular products or service supplier questionnaire may request the name of an individual who holds a key position in your business). We may also collect your personal data from a buyer organisation who has asked us to contact you because you are employed or contracted by a circular products or service supplier organisation that the buyer organisation wishes to have registered on the platform, and are their contact person for that organisation. The personal data we collect covers your name, job title, business email, business telephone number and office address.

We also collect information on circular products or service supplier organisations from publicly available sources and from providers of screening services and combine this with the other information we hold. This sometimes includes information on directors or individuals associated with or working at a circular products or service supplier organisation and might therefore include your personal data.

If you pay for our services using a credit or debit card in your name, we will also collect your card information when you provide it to us.

If you are employed or contracted by a buyer organisation

We collect your personal data where your organisation has provided such personal data to us in connection with the services offered to your organisation by Circular Matchmakers (for example, as the Circular Matchmakers relationship contact.

The personal data we collect covers your name, job title, business email, business telephone number and office address.

HOW WE USE YOUR PERSONAL DATA

If you are employed or contracted by a circular products or service supplier organisation

The information provided to us by your circular products or service supplier organization through the online questionnaire, together with the information we collect from publicly available sources and providers of screening services is kept in our files. This includes your personal data.

After qualification and during the time of your subscription, your personal data will be visible to:

- the buyer organisations in the Circular Matchmakers network your organisation has agreed to join; and/or
- where your organisation has agreed to allow access of your information to a specific buyer organisation only, that specific buyer organisation.

If you are the contact person with Circular Matchmakers for a buyer or circular products or service supplier organisation

We also use your personal data to help us improve our services and develop our relationship with your organisation. This includes:

- Providing you with customer service and account management and contacting you for feedback
- Sharing information with you about how you can use our services
- Providing you with support
- Sending you customer satisfaction surveys
- Sending you our newsletter, research reports, insights and other Circular Matchmakers news

You can unsubscribe from customer satisfaction surveys, our newsletter and associated communications at any time. Where you are employed or contracted by a circular products or service supplier organisation and we collect your personal data from a buyer organisation who has asked us to contact you with a view to registering your organisation on the platform, we validate this information using publicly available sources. Once validated we use your personal data to contact and invite you to register your organisation through our online questionnaire.

BASIS FOR USING YOUR PERSONAL DATA

The basis for which we use your data depends on our relationship and how we are using the data.

Where we are using personal data provided by buyer or circular products or service supplier organisations to provide them with our services, we are doing so because it is necessary for the performance of the service your organisation has registered for or subscribed to, and the contract we have entered into with them. Where we are collecting personal data provided from buyer organisations who wish to engage with your circular products or service supplier organisation or from screening services, we are doing so because it is in

our legitimate interests to invite organisations to become circular products or service suppliers to our buyer organisations.

When we collect personal data from publicly available sources or from providers of screening services, we do so because it is in our legitimate interests to provide our buyer organisations with information to help them identify suitable circular products or service suppliers and risks in their supply chain.

Where we are using personal data to send you customer satisfaction surveys, newsletters or marketing materials we are doing so because it is in our legitimate interests to collect your feedback, develop our products and services and improve our business relationship with you. Alternatively, it is because you have consented to receive these types of communication. You can object to, or withdraw your consent for, Circular Matchmakers using your personal data this way. You can do so by unsubscribing using the link provided in our emails or by contacting us using the details given below.

SHARING YOUR DATA

We share your data using Standard Contractual Clauses approved by the European Commission to the standard expected within the European Economic Area.

When we add your personal data to our platform, we share it with:

- buyer organisations in the Circular Matchmakers network your organisation has agreed to join; and/or
- where your circular products or service supplier organisation has agreed to share the information with only a specific buyer

organisation, the specific buyer organisation your organisation has allowed to access it.

This may include customers with head offices or branches in countries outside the European Economic Area where the data protection laws are not equivalent to those within the European Economic Area. We do so on the basis of explicit consent you have given for your organisation to share your personal data with buyer organisations outside the European Economic Area. If you have not provided explicit consent or wish to withdraw your consent, please contact us at Privacy@CircularMatchmakers.eu or by writing to us at the address provided below.

We also share your data with service providers and subcontractors to our business who process data on our behalf. These may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract we enter into with them.

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, such as in response to a court order or with government or law enforcement agencies.

HOW LONG WE KEEP YOUR DATA

We will retain personal data provided to us by circular products or service supplier and buyer organisations for as long as is necessary to provide them with our services and at least during the term of our agreement with the company you work for. Where we are relying on our legitimate interests or your consent to process your personal data, we will retain your personal data until you object to us processing it or withdraw your consent.

We will also retain personal data where it is necessary to comply with our legal

obligations, resolve disputes and enforce agreements.

Please note we need to hold contact details for individuals at circular products or service supplier and buyer organisations for the performance of the service and the contract we have entered into. If you no longer want us to hold your personal data in these circumstances, we will need an alternative contact detail for your organisation or we will be unable to continue providing your organisation with the service.

YOUR RIGHTS

Individuals in the EU whose personal data we hold, and process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal information because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data.

If you wish to exercise your rights, please contact us at privacy@CircularMatchmakers.eu .

Individuals in the EU also have the right to lodge a complaint with a supervisory authority in an EU member state if you

believe we are infringing EU data protection laws. You can lodge a complaint with the supervisory authority in your EU member state of residence, the member state in which you work or the member state in which the alleged infringement took place.

HOW TO CONTACT US

You can contact Circular Matchmakers in relation to data protection and this privacy notice by writing to:

General Counsel
Circular Matchmakers
Bleijenbeekhof 25
6845GV
Arnhem
Netherlands

Alternatively, you can email us at privacy@CircularMatchmakers.eu .