

## Privacy Policy for Vendors and Suppliers

As part of the implementation and monitoring of contracts with its service providers specialized in the provision of linguistic services and related services (hereinafter the "**Vendors**") and other providers (hereinafter the "**Suppliers**"), certain Personal Data are collected and processed by NIKITA (Acolad Group) and its affiliate companies (hereinafter "**Acolad**"), on natural persons, such as executives, directors, agents, employees, interns and/or consultants, representing the Vendors or Suppliers.

Acolad, as data controller, undertakes to process these Personal Data in accordance with applicable laws and regulations, and in particular French Data Protection Act No. 78-17 of 6 January 1978 (hereinafter the "**Data Protection Act**"), and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "**GDPR**").

In order to inform you of the processing of your Personal Data and of the objectives pursued and the means implemented by Acolad, in accordance with the laws, regulations in force in France and in the European Union, Acolad has created this privacy policy for Vendors and Suppliers (hereinafter the "**Privacy Policy**").

[Why are your Personal Data processed \(data categories, purposes and legal basis for the processing\)?](#)

### **The creation and monitoring of Vendors/Suppliers accounts and the management of the business relationship between Acolad and its Vendors/Suppliers**

Acolad may collect the following data in order to organise the creation and monitoring of Vendors/Suppliers accounts and manage Acolad's contractual relationship with its Vendors and Suppliers:

- Surname, forename;
- E-mail address;
- Company name;
- Country of origin;
- Postal address;
- Telephone number.

The legal basis for the processing of these data is Acolad's legitimate interest in ensuring the creation of the profile of its Vendors and Suppliers in its databases, in managing its contractual relationship with its Vendors and Suppliers, and in ensuring the proper monitoring of orders and deliveries of services carried out by Vendors and Suppliers.

### **For accounting and invoicing**

Acolad may use the aforementioned Personal Data as well as the bank details of its Vendors and Suppliers to ensure the monitoring and payment of invoices issued by Vendors and Suppliers.

The legal basis for this processing is Acolad's legitimate interest in keeping its accounting up to date, in accordance with its legal obligations.

### **For communication to Vendors/Suppliers**

Acolad may also use the aforementioned Personal Data for communication purposes, to send newsletters, information, and invitations to events.

The legal basis for this processing is Acolad's legitimate interest in developing its relations with its Vendors and Suppliers.

### **Who are the recipients of your Personal Data?**

The Personal Data collected are intended solely for the exclusive use of Acolad. However, they may be communicated to certain subcontractors or third parties acting on behalf of Acolad or having a legitimate interest such as:

- Government offices: URSSAF (French social security collection body), Public Treasury;
- Providers: IT services, payroll software, banking services and software, postal and delivery services;
- Local authorities, if required by law or in the case of an investigation and in accordance with local regulations.

Certain subcontractors or third parties may be located outside the European Union. In these circumstances, the transfer of Personal Data is governed by data transfer contracts incorporating the European Commission's Standard Contractual Clauses.

### **What is the retention period for your Personal Data?**

Acolad does not retain your Personal Data any longer than necessary for the purpose for which they were collected, unless Acolad is legally obliged to retain your Personal data for a longer period.

### **What measures ensure the security of your Personal Data?**

Acolad undertakes to adopt all reasonable, appropriate technical and organisational security measures in order to guarantee the integrity, availability and security of your Personal Data against any misuse, alteration or destruction.

To this end, Acolad has implemented technical measures (such as firewalls) and organisational measures (such as a username/password system, physical protection methods). Computer workstations are systematically locked and accessible only via a username and password system. Working time and payroll management software also require access via a username and password.

### **What are your rights?**

In accordance with the Data Protection Act and the GDPR, you have a right to access and rectify your Personal Data, enabling them to be rectified, completed, updated or deleted when they are inaccurate, incomplete or obsolete. You also have a right to restrict the processing of data and a right to object to the processing of data for legitimate reasons.

These rights may be exercised with Acolad's DPO, either by e-mail at the address [dpo@acolad.com](mailto:dpo@acolad.com), or by post at the following address:

Carlos Grau i Palou

Via Giuseppe Rivani 83-40138

Bologna (Italy)

Finally, you have the right to submit a complaint to the CNIL (French Data Protection authorities).

**Date of last update:** January 19<sup>th</sup>, 2022