

24<sup>th</sup> May 2018

This privacy notice explains how we will endeavor to ensure that our commercial engagement (where this results in the processing of personal data) will be conducted in a manner that is compliant with data protection laws.

It is our expectation that the transfer between us of personal data necessary for our business relationship should only take place once a binding written contract<sup>1</sup> has been established that includes contractual terms legally required under data protection laws (including the General Data Protection Regulation (GDPR) and that all processing of personal data shall be comply with such laws and the terms of the binding written contract.

Once established, this contract shall take precedence and determine our obligations in connection with the processing of personal data, whether as controller or processor.

However, we recognise that prior to such a contract being put in place, it may be necessary for you to transfer personal data to us for the purposes of facilitating quotations and other forms of preliminary engagement. This privacy notice sets out how, as part of our business engagement, we will process personal data transferred by you to us (and for which you are the data controller).

We expect that any personal data transferred by you to us for processing as part of our pre-contract engagement or under a binding written contract will be done so lawfully and in full compliance with current data protection laws applicable in your jurisdiction.

We will process and store personal data in accordance with data protection laws.

## 1. What personal data do we collect from Vendors?

We hold and process some or all of the following types of personal data that identifies individuals in connection with your business relationship with us:

- Contractors company information where the following reveals or contains personal information. This includes:
  - Company details, including name, address, telephone numbers, e-mail address, registrations (Company, VAT etc.);
  - Company bank details, including name, account number, sort-code;
  - Company contact details, including name, job role, telephone numbers and email address;
- Personal data stored on company or business documentation that you have either provided directly to HRE or uploaded to our supplier portal. This includes:
  - Contracts;
  - Company certifications that may include details of individuals and any certifications;
  - Quotations, invoices;
  - Documentation confirming deliveries, including Goods Received Notes (GRNs), Certificates of Completion;
  - General communications between HRE and the Vendor.

## 2. How we will use this data

HRE collect and hold the data described in Section 1 in order to process such personal data for the following legitimate purposes and we will at all times ensure that it is processed in accordance with applicable European and UK data protection legislation including the GDPR:

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<sup>1</sup> In circumstances where our contractual arrangement is conducted under HRE's standard contractual terms incorporated through the purchase order procedure, HRE's standard contractual terms will include such terms as are legally required under data protection laws.

# Vendor Privacy Notice

- (a) For the purposes of managing and administering HRE's business and maintaining business contact information regarding the contacts of Vendors that we are working with as part of our contracts and agreements or future contracts;
- (b) For the purposes of making payments to you for any products or services that you provide through your business relationship with HRE;
- (c) We will store personal data (as outlined in section 1) on our vendor and contract management systems and supplier portal ("Novatus"), supplied by AppExtremes LLC Conga Novatus and / or its affiliates and our also on internal systems held securely on HRE's internal network. We have entered into a binding agreement with AppExtremes LLC to ensure that any personal data transferred to, or hosted by, AppExtremes LCC will be stored and processed in accordance with European and UK data protection law and that where AppExtremes LLC host such systems outside the European Economic Area, they will ensure compliance with European and UK data protection law through incorporation of EU Commission approved standard model clauses;
- (d) We may allow employees of affiliates of HRE, including Hitachi Limited (Rail Systems Business Unit) and Hitachi Rail Italy S.p.A. to access such personal information stored on the systems described in (c) above, for the reasons set out in (a) and (b) above. Any such processing will be conditional upon HRE having entered into a binding agreement with Hitachi Limited and Hitachi Rail Italy S.p.A., who have agreed to process such data in accordance with the requirements of European and UK data protection legislation.

We will not share your data with third parties, except as described in this section 2 and as otherwise required by law.

No automated decision making or profiling will be undertaken on such personal data by HRE.

### 3. How long we will retain the data?

If you cease to become a Vendor then HRE will take steps to put beyond use or further processing any personal data that is not required to be kept by law.

### 4. Accuracy of your personal data

You must notify us of any changes to personal data that you have previously provided to us and we will take steps to update such information held on our systems.

All updates should be sent to: [Procurement.Support@hitachirail-eu.com](mailto:Procurement.Support@hitachirail-eu.com)

### 5. Rights of Data Subjects

We will provide such reasonable assistance as necessary to assist you in responding to any subject access request where we hold or process the personal data belonging to the data subject making the subject access request.

### 6. Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to HRE's Data Protection Leader at [dataprotection@hitachirail-eu.com](mailto:dataprotection@hitachirail-eu.com)

**We reserve the right to amend this privacy notice at any time.**