Privacy statement for the
Electronic Supplier Portal (ESP)

Gates Industrial Europe SARL, a private limited liability company under Luxembourg law, with registered offices at Boulevard d’Avranches 16, 1160 Luxembourg (“we”/”us”/”Gates”), is committed to protecting and respecting any personal information you share with us. Gates will be acting as a "data controller" for the processing activities described in this statement, which means that we define the purposes and the means for these processing activities.

This privacy statement concerns the processing with respect to global supplier management in the Electronic Supplier Portal (“ESP”) and explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided in the ESP, how that information is used and what rights can be exercised in relation to personal data. The supplier declares that its employees, whose data has been made available, have been informed about this statement.

Gates is committed to respecting privacy regulations and data protection rights. For general information on the processing of personal data by Gates, please first read the Gates Global Internal Privacy Principles and the Gates Industrial Europe SARL Privacy Policy, found here: https://www.gates.com/gb/en/utility/privacy-policy.

Gates collects personal data in the ESP with the following purposes:
- Performance, settlement, and/or conclusion of applicable agreements;
- Procurement and administrative reasons; and
- Receiving services.

Personal data collected in this context may become part of the database in ESP with the purpose to centrally gather, evaluate and report supplier data.

Only data necessary for the above purposes is collected and processed, namely: name (first and last) of contact persons at the supplier company, phone numbers, e-mail (function and title but this is not mandatory), and company details (such as company name, street, postal code, town, country). No special categories of personal data are collected (such as health data, racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation).

Gates only keeps the data for as long as necessary with regard to the purpose(s) of the processing of personal data and only relevant Gates employees have access to the data. Gates will not share personal data with third parties.

Gates will apply adequate security measures to protect personal data to any type of harm, such as unauthorized access or disclosure, loss, theft or damage. If data transfers take place outside of the
EEA, Gates takes appropriate steps to ensure the protection of personal data, in particular by an intragroup data transfer agreement.

According to the EU General Data Protection Regulation (GDPR) 2016/679, data subjects in the European Union are entitled to data subject rights such as the right to access, rectification, erasure.

- Suppliers can access, change or update their information directly in our system Electronic Supplier Portal (ESP) or by contacting their Gates Commodity Manager or other Gates sourcing point of contact.

- Suppliers can exercise their other rights (e.g., access, erasure) by contacting privacy@gates.com or via post to:

  Data Privacy Team  
  Gates Industrial Europe SARL  
  Boulevard D’Avranches 16  
  2240 Luxembourg

- Specifically for our German entities, we have appointed a Data Protection Officer, to be contacted via DPO-Gates@data-elements.de.