Privacy Statement
pursuant to art. 13 and art. 14 of the Regulation (EU) 2016/679 ("GDPR") and the Dutch GDPR Implementation Act .
- CUSTOMERS, SUPPLIERS AND JOB APPLICANTS-

1. Identity and contact details of the Data Controller

Pursuant to Article 13 of the GDPR, Cembre B.V. ("Cembre", the "data controller"), a private limited liability company (besloten vennootschap) incorporated under the laws of the Netherlands, with its registered office at Luchthavenweg 53, 5657 EA, Eindhoven, the Netherlands, and registered with the Dutch Chamber of Commerce (Kamer van Koophandel) under number 94959838, acting as the data controller, hereby informs you about the processing of personal data that you provide to the data controller or that the data controller otherwise obtains in the context of the contractual relationship between the parties, in accordance with applicable data protection law.
The contact details of the Data Controller are as follows: privacy@cembre.com

2. Object of the processing: type of data processed

2.1 Data subjects

In addition to the processing described in the privacy policy that governs the processing of personal data that is collected via the website, the data controller processes personal data of its business contacts (customers and suppliers, including individual contacts at corporate customers and suppliers) and job applicants, of which the data controller becomes aware by virtue of our commercial, contractual and recruitment relationships.

2.2. Data processed

In particular, the data controller processes the following data:

a) identification and contact data of business contacts: name, job title, business address, business telephone number and business email address;
b) company and tax identification data of business contacts: company name, registration number, VAT number and, where relevant to individual entrepreneurs, bank account details;
c) data collected through tracking pixels embedded in newsletters and commercial and promotional communications, including information relating to the date and time such communications are opened and viewed and, more generally, any interactions with such communications, as well as the device used, IP address, and clicks.
d) job applicant data: where you apply for a vacancy with Cembre, the data controller processes
    i) personal and identifying information (e.g., name, surname, date of birth, address, image, tax code, etc.), contact information (e.g., landline and/or mobile telephone number, email address, etc.),
    ii) work and professional data (e.g., information on previous work experience), data relating to your educational background (e.g., qualifications obtained, training courses attended, etc.), and
    iii) any other information contained in your CV, as well as personal data relating to your references

and/or any personal data contained in tests or questionnaires submitted to you during the selection process.

3. Purpose and legal basis of the processing

3.1 Legal basis

The table below summarizes, for each processing activity described above, the applicable legal basis under Article 6 GDPR (and, where relevant, the specific legislation implementing the GDPR).

Purpose	Type of data	Legal basis
Compliance with accounting, tax and other statutory obligations	Identification and contact data; company-related information; billing, payment and tax information, where relating to an identifiable individual	Compliance with a legal obligation (Article 6(1)(c) GDPR)
Managing contractual and commercial relationships with customers, suppliers and other business partners	Identification and business contact data; company-related information; contractual, billing and payment information	Performance of a contract or taking steps at the data subject's request prior to entering into a contract (Article 6(1)(b) GDPR), where the data subject is personally a party to or prospective party to the contract; otherwise, the data controller's legitimate interest in managing its business relationships (Article 6(1)(f) GDPR)
Responding to enquiries and facilitating contact with a sales representative	Identification and contact data (name, business contact details)	Taking steps at your request prior to entering into a contract (Article 6(1)(b) GDPR), where applicable; otherwise, the data controller's legitimate interest in responding to business enquiries and developing customer relationships (Article 6(1)(f) GDPR)
Handling contractual complaints, warranty claims and other claims arising from the contractual relationship	Identification and contact data; contractual, commercial and claims-related information	Performance of a contract (Article 6(1)(b) GDPR)

Purpose	Type of data	Legal basis
Establishing, exercising or defending legal claims	Identification, contact and contractual/commercial relationship data, payment and claims-related information	The data controller's legitimate interest in establishing, exercising or defending legal claims and recovering outstanding debts (Article 6(1)(f) GDPR)
Managing reports made under Cembre's internal reporting (whistleblowing) procedure	Identification and contact data of the reporting person and other persons concerned; information contained in or relevant to the report	Compliance with a legal obligation (Article 6(1)(c) GDPR, in conjunction with the Dutch Whistleblowers Protection Act (Wet bescherming klokkenluiders)), where is subject to such obligation
Assessing your suitability for a vacancy, organising interviews/assessments and communicating with you about your application	Identification and contact data; CV, cover letter and other application materials; interview and assessment information	Taking steps at your request prior to entering into an employment contract (Article 6(1)(b) GDPR)
Verifying your right to work in the Netherlands and complying with other recruitment-related legal obligations	Identification data and right-to-work documentation	Compliance with a legal obligation (Article 6(1)(c) GDPR, in conjunction with the Dutch Foreign Nationals Employment Act, Wet arbeid vreemdelingen, where applicable)
Sending marketing communications, including newsletters, promotional materials and information about products, services and commercial opportunities	Name and business contact details, including email address	Consent, or, for existing customers and similar products/services, legitimate interest (Article 6(1)(f) GDPR)
Profiling for marketing purposes, including analysing preferences, interests and purchasing behaviour in order to tailor commercial communications	Identification and contact data; information about interests, interactions, purchases and products or services in which you have expressed an interest	Consent (Article 6(1)(a) GDPR)
Measuring the effectiveness of, and optimising marketing and promotional communications sent to data subjects (including	Data collected through tracking pixels embedded in newsletters and commercial and promotional communications	Consent (Article 6(1)(a) GDPR)

Purpose	Type of data	Legal basis
newsletters and other digital communications)		

3.2 Consent and the right to object

With your freely given and optional consent, the data controller may process certain personal data (i.e. name, surname, email address) for marketing purposes (sending advertising material, direct sales and commercial communication, sending newsletters, monitoring and analysis of user engagement with newsletters, marketing and promotional communications, emails and other digital communications, including by means of tracking pixels), to propose the purchase of products and / or services, present offers, promotions and commercial opportunities and / or initiatives of the data controller.

Where processing for marketing purposes is based on your consent, you may withdraw this consent at any time by following the procedure described in paragraph 6 below. Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

Separately, where permitted under art. 11.7(3) of the Dutch Telecommunications Act (Telecommunicatiewet), the data controller may use an email address obtained in connection with the sale of a product or service to send marketing communications concerning our own similar products or services without obtaining separate prior consent.

In such cases, you will be given a clear and easy opportunity to object to the use of your email address for these purposes, both when your email address is collected and in each subsequent marketing communication.

3.3 Further processing purposes: profiling

With your freely given and optional consent, your personal data (i.e. personal and contact data and information relating to the products and services in which you have expressed an interest) may also be processed for profiling purposes, or to reconstruct your preferences and purchasing habits and use of these products and services, in order to be able to send you commercial offers consistent with the profile identified.

In case of consent, you may at any time revoke the same, making a request in the manner indicated in paragraph 6 below.

4. Methods of data processing

Data processing may consist of their collection, registration, organization, structuring, storage, adaptation, modification, extraction, consultation, use, communication, comparison or interconnection, limitation, cancellation and destruction, in accordance with the provisions of art. 4 n. 2) of the GDPR. It can be carried out both on paper and with the aid of electronic, IT and telematic tools, in a manner and with suitable tools to ensure the security and confidentiality of the data. In particular, all appropriate technical and organizational measures will be adopted to protect data from accidental or unlawful destruction, accidental loss or alteration, unauthorized access, in order to meet the legal requirements and protect the rights of the

data subjects.

5. Communication of your data

For the purposes indicated in this notice, your data may be disclosed to commercial partners, consultants and freelancers, banks and credit institutions, insurance companies, financial, leasing, service, management and credit recovery companies , auditors, public bodies, auditing or supervisory bodies, judicial authority, to fulfil obligations deriving from applicable law or regulations or for aspects concerning the management and execution of the legal relationship existing with the data controller. They may also be disclosed to companies within the Cembre Group and, in the case of job applicants, to external recruitment agencies or background-screening providers engaged by the data controller, where relevant to the vacancy and subject to prior notice to the applicant.

The updated list of processors is available upon request.

6. International Transfers of Personal Data

Some of your personal data may be transferred to Cembre Group companies located outside the European Economic Area ("EEA"), in particular in [countries]. Where such a transfer takes place, the data controller ensures it is based on an adequacy decision of the European Commission under Article 45 GDPR, or subject to appropriate safeguards under Article 46 GDPR, such as the European Commission's Standard Contractual Clauses, together with any supplementary measures where necessary.

7. Data Retention Periods

The data controller does not retain personal data for longer than is necessary for the purposes for which it is processed, as described in this policy, unless a longer retention period is required by law or is necessary for the establishment, exercise or defence of legal claims. The retention periods applied by the data controller depends on the nature of the personal data, the purpose of the processing and the legal obligations applicable to the data controller. The following principles apply in this regard:

- Personal data of business contacts is generally retained for the duration of the business relationship and for up to seven years thereafter, in line with the general fiscal record-keeping obligations.
- Personal data of unsuccessful job applicants is retained for up to four weeks after the vacancy is filled or the procedure is otherwise closed, in accordance with Dutch Data Protection Authority guidance; where you give explicit consent, data controller may retain your data for up to one additional year for consideration for future vacancies.
- Website enquiry data is retained only for as long as necessary to respond to and follow up on the enquiry.

8. Use of Artificial Intelligence (AI) Systems

The data controller, as part of the Cembre group, may use Artificial Intelligence (AI) systems, developed internally or provided by third parties, to support administrative, organizational, commercial, legal, documentary, research, analytical, and business process automation activities. Such tools are used exclusively to assist authorized personnel and do not involve fully automated decision-making processes

producing legal effects or similarly significant effects within the meaning of Article 22 of the GDPR, unless otherwise specified in a dedicated notice. The accuracy, relevance, and reliability of AI-generated outputs are verified before they are used in decision-making or operational processes.

Where the use of AI systems involves the processing of personal data, Cembre implements appropriate technical and organizational measures to ensure the security, confidentiality, integrity, and availability of the data processed, relying on providers that offer adequate safeguards pursuant to Articles 28 and 32 of the GDPR where applicable, Regulation (EU) 2024/1689 (the "AI Act").

Any personal data processed through AI systems are used exclusively for the purposes described in this privacy notice and are not used by Cembre or third parties for the training, development, or improvement of AI models, unless a different legal basis applies and the data subjects have been informed accordingly.

Further information regarding the use of Artificial Intelligence systems may be requested from the Data Controller within the limits established by the applicable legislation.

9. Your rights

Under the GDPR, and subject to the conditions and limitations set out therein, you have certain rights in relation to the processing of your personal data by us. You may exercise these rights by contacting us using the contact details set out in this section. The data controller may request additional information where necessary to verify your identity before responding to your request:

- Right to object. You have the right to object, on grounds relating to your particular situation, to the processing of your personal data where such processing is based on our legitimate interests. In such case, the data controller will cease processing your personal data unless it can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or where the processing is necessary for the establishment, exercise or defence of legal claims. Where your personal data is processed for direct marketing purposes, you have the right to object to such processing at any time. If you object, data controller will no longer process your personal data for direct marketing purposes.

- Right of access. You have the right to obtain confirmation as to whether the data controller process your personal data and, where this is the case, to obtain access to such personal data and the information required under the GDPR.

- Right to rectification. You have the right to request the correction of inaccurate personal data concerning you and, taking into account the purposes of the processing, to have incomplete personal data completed.

- Right to restriction of processing. You have the right to request that the data controller restricts the processing of your personal data in the circumstances set out in the GDPR, including where you contest the accuracy of the personal data, where the processing is unlawful and you oppose erasure, or where data controller no longer requires the personal data for the purposes of the processing but you require it for the establishment, exercise or defence of legal claims.

- Right to erasure. You have the right to request the erasure of your personal data where the conditions of Article 17 GDPR are met, for example where the personal data is no longer necessary for the purposes for which it was collected, where you withdraw your consent and there is no other legal basis for the processing, or where you successfully object to the processing. This right does not apply where processing is necessary, for example, to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

- Right to data portability. Where the processing of your personal data is based on your consent or on the performance of a contract and is carried out by automated means, you have the right to receive the personal data you have provided to data controller in a structured, commonly used and machine-readable format and, where technically feasible, to have such personal data transmitted directly to another controller.

- Withdrawal of consent. Where the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

- Right to lodge a complaint. If you believe that the data controller processes your personal data in breach of applicable data protection laws, you have the right to lodge a complaint with the competent supervisory authority.

The exercise of your rights and any requests for information or clarifications may be addressed to the Data Controller, Cembre B.V., based at Luchthavenweg 53, 5657 EA, Eindhoven, the Netherlands, in the person of its legal representative, or by email to privacy@cembre.com.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), Hoge Nieuwstraat 8, 2514 EL The Hague, the Netherlands (www.autoriteitpersoonsgegevens.nl), or with the supervisory authority of another EU member state where you habitually reside, work, or where the alleged infringement occurred.

For anything not expressly provided for by the provisions referred to here, reference should be made in full to the legislation in force on the subject of privacy.

10. Changes

Please note that this Privacy Statement may be modified from time to time as new services are launched, to reflect new technologies, industry practices, and regulatory requirements, or for other purposes.

The data controller will inform you with a relevant notification if such changes are significant and will obtain your consent where required by applicable law.

Eindhoven, 17/09/2026