

# Privacy Notice Sanction List Screening

This privacy notice fulfils the information obligations in accordance with the requirements of Art. 12 et seq. of the EU General Data Protection Regulation (hereinafter referred to as "**GDPR**") and provides you with an overview of the processing of your personal data (hereinafter referred to as "**data**").

## 1 Who is responsible for processing my data?

This privacy policy applies to the following company (hereinafter referred to as the "**Majorel**"):

Majorel XYZ

Street

Postal Code, Town

E-mail: [dataprotection.gee@majorel.com](mailto:dataprotection.gee@majorel.com)

Majorel is responsible for processing your data as part of the sanctions list screening process (hereinafter referred to as the "**Company**"). The Company processes personal data in accordance with the provisions of the GDPR.

## 2 What data is collected?

### 2.1 Description of the data categories

As an international service provider, Majorel actively participates in foreign trade. For foreign and security policy reasons, in particular to prevent the proliferation of weapons of mass destruction and for the purpose of combating terrorism, foreign trade law lays down certain prohibitions and restrictions that all participants in foreign trade must observe. Restrictions arise not only from the respective national law, but also from other legal sources. Violations of foreign trade law can result in considerable fines or imprisonment for both management and acting employees. In addition, there are risks of liability under company law and civil law. Last but not least, actual or alleged "export scandals" can lead to reputational damage for the company.

The data of, among others, the following contacts/business partners are recorded:

- Debtors
- Creditors
- Banks
- Temporary workers
- freelancers
- Interns
- Service providers, e.g. personnel service providers, freight forwarders
- Customers (potential customers, if applicable)
- Suppliers

- Subcontractors
- Consultants, agents, sales representatives

Internal contacts to whom funds or economic resources are made available, e.g.:

- Job applicant (before contract offer)
- Salaried employees (due to salary payment)

The following data is processed: (master data)

- Names (first name/last name)
- Address
- Date of birth, if necessary

## **2.2 Description of the data sources**

The aforementioned data originate from your correspondence with our company, e.g. in the context of the initial establishment of a business contact or in the context of an application. If a permanent process is initiated as a result of this contact (business contact in connection with a recording of your data in the debtor or creditor master data) or application and selection process or recruitment, a sanctions list screening against national and international sanctions lists is carried out.

## **3 What data is collected and for what purposes?**

The data processing described above is carried out to protect our legitimate interests under Article 6 (1) (f) GDPR.

Business contacts with persons on one of the sanctions lists are prohibited. Anyone who maintains business relations with persons on a US sanctions list also runs the risk of being listed themselves and must also reckon with severe fines (cf. <https://home.treasury.gov/policy-issues/financial-sanctions/civil-penalties-and-enforcement-information>). Other countries also have bans on providing services to restricted parties with comparable penalties.

Compliance with sanctions and export control law to avoid corresponding sanctions and penalties is in the interest of our company.

## **4 Duration of storage or criteria for determining this duration**

The data will be stored for as long as necessary to prove that sanctions list matching has taken place, but no longer than 5 years.

## **5 Who receives my data?**

In the course of processing, various service providers receive access to your data (so-called "**processors**"). Data processing agreements ensure that these service providers are bound by instructions, committed to data security and the confidential handling of your data.

## **6 Is my data processed outside the EU or EEA (third country transfer)?**

Insofar as the recipients process your data outside the European Union or the EEA, this may result in your data being transferred to a country which does not guarantee the same data protection standard as the European Union. In this case, we will ensure that the recipients

guarantee an equivalent level of data protection by contract or otherwise, except in the case of an application of Article 49 of the GDPR. You can request a copy of these guarantees via the contact address mentioned in point 1.

## **7 Is there automated decision making?**

We do not use fully automated decision-making, including profiling, for the purposes set out in section 3.

## **8 What data protection rights do I have?**

You can assert your data protection rights both by post at the address given above or by e-mail at [dataprotection.gee@majorel.com](mailto:dataprotection.gee@majorel.com).

**Right to information:** As a matter of principle, you will receive information about your personal data stored by us from the office where your rights have been asserted.

**Right of objection:** In accordance with Art. 21 GDPR, you have the right to object at any time to the processing of your data on the legal basis of Art. 6 (1) lit. f GDPR for reasons arising from your particular situation. You can thus object to us using your data for the data processing addressed under 3.

You have the following **additional rights**:

- **Right to rectification:** If data about you is incorrect or no longer up to date, you have the right to request that it be rectified.
- **Right to erasure or restriction of data processing:** You also have the right to request the erasure or restriction of the processing of your data in accordance with Art. 17 or Art. 18 GDPR.
- **Right to data portability:** Where you have provided us with data, you have the right to receive the data relating to you in a structured, commonly used and machine-readable format and you have the right to transfer the data to another controller, provided that our processing is based on your consent or on a contract with you and the processing is carried out using automated procedures.
- **Right of appeal:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR. The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.