

Privacy Notice for Representatives of Partners and Business Leads

Effective Date: 12 March 2025

1. Who is responsible for your personal data?

The CellMark group company with which you or your employer has a business relationship (e.g., as a customer, supplier, or agent) is the controller of your personal data and determines why and how your personal data is processed.

If you have questions about who is the controller for your specific business relationship please contact our Data Protection Coordinator as indicated in section 8 below.

2. Details on the data we process about you

Below is a consolidated overview of why we process your data, what categories of data are involved, the legal basis for processing, and how long we typically keep it.

Purpose	Data Categories	Legal Basis	Retention Period	Source
Partner Relationship Management - Negotiating and closing agreements	Name, contact details, company affiliation, company role	Legitimate interest to engage with you as a representative of a potential partner (GDPR Art. 6.1.f)	Data in the CRM is deleted 6 years after the end of the relationship, however contracts, orders and similar data are kept for the duration of the company	You or your employer
Partner Relationship Management - managing the relationship over time, communicating with you as a representative of a partner	Name, contact details, company affiliation, company role	Legitimate interest to engage with you as a representative of a partner (GDPR Art. 6.1.f)	For CRM: 6 years after the end of the relationship; For email: 10 years after the end of the relationship. Contracts, orders and	You or your employer

Purpose	Data Categories	Legal Basis	Retention Period	Source
			similar data that may name you are kept for the duration of the company.	
Naming you as a reference on invoices (if required by the partner)	Name	Legitimate interest to include references on invoices (GDPR Art. 6.1.f)	Throughout the existence of the company	Your employer
Re-Initiating Contact with Former Partners	Name, contact details, company affiliation	Legitimate interest to reconnect with former partners (GDPR Art. 6.1.f)	6 years after the partner relationship ends	Internal records
Sending Newsletters and Marketing Communications	Name, email address, company affiliation	Legitimate interest to send marketing (B2B) to representatives of partners (GDPR Art. 6.1.f) Consent (if voluntarily signed up) (GDPR Art. 6.1.a)	Existing partners: Retained for 2 years after the partner relationship ends Voluntary subscription: Retained until you unsubscribe	You, your employer
Contacting and Communicating with Business Leads Approaching potential new partners	Name, phone number, email address, company affiliation	Legitimate interest to contact representatives of potential business partners (GDPR Art. 6.1.f)	12 months, unless consent is provided	Public sources, business directories, purchased databases
Handling Complaints and Legal Claims - If you are a representative involved in a case or claim	Name, contact details, company affiliation, company role, relevant complaint/dispute details	Legitimate interest to process information for complaints or disputes (GDPR Art. 6.1.f)	Throughout the existence of the company	You, your employer, or other involved parties
Checking for	Name, company	Legitimate interest	4 years from 1	You, your employer,

Purpose	Data Categories	Legal Basis	Retention Period	Source
Sanctions, Export Control	affiliation, sanction list status (for shareholders and significant roles in the company)	to protect the company against contracting in breach of sanctions or export control rules (GDPR Art. 6.1.f)	January the year following the one when the relationship is terminated.	third party sanctions checker.

3. Who can gain access to your personal data?

- **Sharing Within Our Group**

- We share your data with group entities if relevant for our contractual or business relationship.

- **IT Service Providers**

- Our IT services providers are processors which process your data as instructed by us and under confidentiality.
- We use digital communication and productivity tools (like Microsoft 365), ERP and CRM tools (like IFS AB, Dolibarr), contract management tools (like Gatekeeper).

- **Legal or Regulatory Disclosure**

- We may disclose data if required by law or a binding legal request.
- We may also share your **information with auditors** to comply with accounting regulations if the partner requires your name on invoices.

4. Transfers

The controller processes your data in their own jurisdiction, as well as in the European Economic Area and UK. Our use of IT services providers includes transfers of personal data from the EEA to The United States, which are performed under the Data Privacy Framework or EU Standard Contractual Clauses.

5. Security measures

We apply technical and organizational measures to protect your data, such as access controls, secure servers, and encryption (where appropriate). We also regularly review and update our security practices.

6. Your rights with regard to the processing of your personal data

- Access: Request a information about or a copy of the personal data we hold about you.
- Rectification: Correct or update inaccurate/incomplete data.
- Erasure: Ask us to delete data no longer needed or unlawfully processed.
- Restriction: Limit the processing of your data under certain conditions (e.g., if accuracy is contested).
- Objection: Object to processing based on legitimate interests; we will stop unless we have compelling grounds.
- Portability: Receive data you provided in a structured, commonly used format (for processing based on contract or consent).
- Withdraw Consent: If processing is based on your consent, you can withdraw consent at any time with effect for the future, without affecting prior processing.
- Complaint: Lodge a complaint with the data protection authority in your country.

To exercise any of these rights you can use the form available at <https://www.cellmark.com/about/privacy/>. Alternatively, you can contact us as mentioned below. We generally respond within one month, unless legally required to respond faster.

7. Updates to This Notice

We may update this Notice to reflect changes in our data practices or legal requirements. We will post any revised Notice on our website and indicate the “Effective Date” date at the top.

8. Contact Us

If you have questions about this Notice or wish to exercise any rights, feel free to contact us:

Email: dataprotection@cellmark.com

Phone: +46(0)31-100 300

Thank you for your collaboration with CellMark!
