

Data protection information in the context of business relations

The protection of your personal data is very important to us. Therefore, we would like to transparently inform you about how we process your data.

1. Information on the Controller

The companies of the ALDI SÜD corporate group that your company has contractual relationships with are responsible for data processing.

ALDI Digital Services GmbH
ALDI International Services SE & Co. oHG

Mintarder Str. 36-40, 48481 Mülheim an der Ruhr

Hereinafter referred to as ALDI.

Data protection officer: Kay-Torsten Schuy
dataprotectionofficer.adx@aldi-sued.com

2. Categories of personal data processed and transferred

- **Identification data** (e.g. salutation, title, academic degree, first, middle and last name, nationality, birth name, birth date, place of birth, gender, profile picture, parents' name(s))
- **Business-related organisational data** (e.g. company, position, department, team, line manager name, HR responsible, title, operational functions, business unit, profile picture)
- **Business-related contact data** (e.g. business e-mail address, business telephone number, business fax number, company postal address, seat)
- **IT-related data** (e.g. username, user ID, PC name, log data like time of login and logout, activity logging, IP-address, system generated unique identifier(s), user role, user permission information, time zone, standard locale, location)
- **Data related to the onboarding of externals** (e.g. learning history/training record including date and time of completed learnings)

3. Purpose and legal basis for the processing the data

Generally, we use your personal data to contact you, allow you access to our tools and to log your interactions with our tools including learning tools. Depending on the specific use case, there are different legal bases applicable:

Processing is necessary for the fulfilment of legal obligations by ALDI:

Legal obligations include, but are not limited to, the following:

- Ensuring compliance with tax and commercial law
- Ensuring compliance with the provisions of the anti-terrorism regulations
- Compliance with the act for the better protection of whistleblowers
- Compliance with health and safety measures
- Conducting occupational safety training

Processing is necessary for the purpose with the legitimate interest pursued by ALDI:

If required, ALDI may also process your data in accordance with Art. 6 para. 1 f) GDPR in order to pursue our legitimate interests or those of third parties (e.g. other ALDI SOUTH entities). This includes, for example, the following use cases:

- Internal and external communication
- Operational organization
- Providing business relevant software solutions, partly supported by AI features, including: system operation, support, maintenance, and improvement of services and systems including reporting) for example supplier portal
- Ensuring that appropriate security measures are taken with regard to our IT systems
- Cookies that are necessary for the operation of the website
- Other administrative purposes

4. Source of the data

The data is provided to us by you, the company you belong to, other business partners or from publicly accessible sources (e.g. your company's website)

5. Categories of recipients

Within the ALDI SOUTH Group, your personal data will only be made available to individuals or parties (e.g. business units) that actually require the data for fulfilling ALDI's contractual and legal obligations. Within the ALDI SOUTH Group, your data may be transferred to companies that have been commissioned to centrally process data on behalf of affiliated companies of the ALDI SOUTH Group (e.g. for vendor management).

The data is forwarded to and used by the following recipients/categories of recipients (including recipients outside of the ALDI SOUTH Group):

- Employees of the ALDI SOUTH Group and HOFER
- National and foreign authorities, insofar as this is necessary for the fulfilment of our legal obligations (e.g. German tax authorities)
- Banks
- External consultants and service providers, for example software providers, SaaS providers as well as providers in the area of corporate communication, work organisation, etc.

Personal data is also transferred to service providers and/or business entities of the ALDI SOUTH Group outside of the European Economic Area (EEA). However, personal data is only transferred to those service providers and ALDI SOUTH business entities in third countries for which the EU Commission has confirmed an appropriate level of data protection or that present other appropriate data protection guarantees (e.g. binding company-internal data protection regulations or EU Standard Contractual Clauses). For detailed information about this and the data protection standards of our service providers in third countries, please contact the Data Protection Coordination team.

6. Storage period

Your data will be deleted when the data is no longer required for the purpose for which it was collected or otherwise processed (e.g. to fulfil contractual obligations) and also is no longer required to fulfil legal obligation (e.g. in case of tax and commercial retention periods).

Your personal data will be deleted, particularly if one of the following reasons applies:

- Once the personal data is no longer required for the purposes for which it was originally collected or otherwise processed.
- The personal data is no longer required for the fulfilment of a legal requirement (e.g. expiration of retention periods for the purposes of tax law or commercial law).
- Once the personal data is no longer required for the fulfilment of a contractual obligation.

Examples:

- Deletion of payment related data in accordance with commercial and tax retention periods of 10 years
- Deletion of non-contract related communication (e.g. e-mail correspondence) after 7 years

7. Automated decision-making and profiling

Automated decision-making is not applied.

8. Data subject rights

Under the prerequisites of Art. 15–22 of the GDPR, you may request information, correction of incorrect data, deletion or restriction of processing or transfer of personal data concerning you, and object to the processing of your personal data.

Please direct these requests and any other questions you may have directly to your line manager or by e-mail to dataprotection.international@aldi-sued.com.

Of course, you also have the right to file a complaint with the responsible supervisory authority.