

Information Obligation for Contractors and Clients

Content of the information obligation for contractors and clients

1. The Data Controller is: CP Witter Ltd, located at C/O Dyke Yaxley Limited, 1 Brassey Road, Old Potts Way Shrewsbury, SY3 7FY, UK. Our registration files are kept by the Companies House in the UK. Our company registration number is 01362420. Tax number is GB310373700.

You can contact us by:

- a. by letter: C/O Dyke Yaxley Limited, 1 Brassey Road, Old Potts Way Shrewsbury, SY3 7FY, UK
- b. by e-mail: ea-ger-info@horizonglobal.com

2. Purpose, basis and duration of personal data processing:

L.p.	Legal basis	Purpose of processing	Duration
1.	Article 6 sec 1(b) GDPR – performance of a contract to which the data subject is party	conclusion and implementation of the contract	for the time necessary for the performance of the contract and, after its termination, the personal data will be processed for the time necessary to demonstrate the correct performance of the obligations arising therefrom
2.	Article 6 sec 1(c) GDPR – legal obligation	compliance with a legal obligation to which the Data Controller is subject , in particular tax obligation.	the time necessary to fulfil the Data Controller's statutory obligations, including until the expiry of the limitation period for tax liabilities
3.	Article 6 sec. 1(f) GDPR – legitimate interest	1) providing security, including monitoring access to office space; 2) maintaining business relations with contractors; 3) management of transport and warehouse logistics; 4) conducting the approval procedure for agreements and contracts at the level of CP Witter Ltd;	for the time necessary for the purposes of the legitimate interest pursued by the Data Controller, but for no longer than until you have raised an objection to the processing of your personal data

		5) establishing, investigating and defending against claims.	
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3. Recipients of personal data may be:

- a. banks,
- b. companies of First Brands Group EMEA
- c. audit and legal services providers,
- d. entities providing software and tools used by the Data Controller,
- e. IT and hosting services providers,
- f. e-mail service provider,
- g. entity providing security services,
- h. postal and courier service providers.

4. Due to the Controller's use of tools and software, provided, for example, by Microsoft Corporation, and its cooperation with First Brands Group companies located worldwide, your data may or will be transferred outside the European Economic Area, including, for example, to the United States. If the transfer of your personal data is necessary, then this will be done on the basis of a decision of the European Commission dated 10.07.2023 issued on the basis of a Regulation of the European Parliament and of the Council (EU), finding an adequate level of personal data protection provided under the EU-US data protection framework.

5. Providing data is voluntary, but the consequence of not providing it will be the inability to conclude and perform the contract.

6. The Data Controller will not make decisions that are based solely on automated processing, including profiling, that would cause legal effects for the data subject or would similarly significantly affect their situation.

7. You have the following rights in relation to the processing of your personal data to:

- a. access, rectify and request removal of your personal data, as well as the right to restrict the processing of your personal data;
- b. object to the processing of personal data;
- c. lodge a complaint with the supervisory body, which in the UK is Information Commissioner's Office (ICO), if your data is processed contrary to legal requirements.