

## **Data Protection at: [sep.lidl.com/self-edi-portal.lidl.com](https://sep.lidl.com/self-edi-portal.lidl.com)**

**(Version 1.0 dated 12/1/2020)**

Thank you for visiting our data protection section. We at Lidl want you to feel comfortable and safe when you visit our website, and to know that one of the things that sets us apart is our commitment to protecting our customers' data.

The following data protection notice is designed to inform you about how and to what extent your personal data is processed when you use the SELF EDI Portal. Personal data is information that identifies you or could identify you directly or indirectly. The statutory basis for data protection is, in particular, the EU General Data Protection Regulation (GDPR).

### **I. SELF EDI Portal**

When you **use our portal** to complete the full process of connecting to the electronic data exchange via EDI, user accounts are created and thus your and your employees' personal data is collected and processed.

#### Purposes of the processing/legal bases:

Lidl Stiftung & Co. KG procures and sells goods and services in accordance with the licenses issued by the authorities. In this connection, we process the supplier master data and EDI communications parameters necessary to the performance of contracts as well as your and your employees' personal data in order to render it possible to use our portal. This specifically includes:

- the supplier's Global Location Number (GLN);
- the Company's short name;
- first name, last name;
- area of responsibility;
- e-mail address; and
- telephone number.

You will provide our EDI procurement department this data in a "master data sheet" and the department will create an account for you. You will then be given the option to create a password so that you can log in to the portal in the future. There, you can update further master data, define EDI communications parameters, complete the tasks necessary to ensure successful connection and subsequently schedule to connect further countries and/or message types with the purchasing department.

Throughout the connection process, the portal also time-stamps the completion of the individual test phases. These time stamps are used in particular to monitor the connection processes and create statistical reports.

The legal basis for this is Article 6(1)(f) GDPR, i.e., you provide us with the data on the basis of the contractual relationship between yourself and us. To the extent your employees' data is collected by data processing, this is done within the scope of our shared, legitimate interests in the use of standard IT systems for efficient cooperation within the scope of our contractual or employment obligations within the meaning of Article 6(1)(f) GDPR.

Recipients/categories of recipient:

Out EDI procurement department receives access to your data for the purpose of creating an account.

In the context of the aforementioned processing, your data will be processed by contract processors, particularly where software maintenance is concerned. Such processors are carefully selected and, where required by law, bound by contract in accordance with Article 28 GDPR.

Storage time/criteria for determining storage time:

Upon termination of the contractual relationship, your SELF EDI Portal account will be deleted without undue delay.

## II. Cookies

Purposes of the processing/legal bases:

We, Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74172 Neckarsulm, Germany, are the controller with respect to data processing in connection with the use of "**cookies**" and other **similar technologies to process usage data** on all (sub-)domains at sep.lidl.com/self-edi-portal.lidl.com.

**Cookies** are small text files that are stored on your end device (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not cause any harm to your end device, nor do they contain any viruses, trojans or other malware. The cookie stores certain information that results in connection with the specific end device deployed. This does not, however, mean that we will immediately become aware of your identity.

Our cookies and similar technologies are **technically necessary**, as you cannot use our services without them. They are used in order to correctly display our website, to guarantee the functions you request and to record your logging-in in the login area.

The following contains an **overview** of the cookies and other technologies we use, including their function, expiration, and any third-party providers involved:

Technologies	Purpose of the processing	Expiry/duration of storage	Third-party providers involved
(Session) cookies	<ol style="list-style-type: none"> <li>1. You remain logged in when you navigate to a different page on the portal.</li> <li>2. Interim storage of entries and/or files so that they are still available after you navigate to a different page.</li> </ol>	<p>Until the end of the session. The session expires when the user logs out or automatically, for example after a longer period of inactivity.</p>	None

The use of technically necessary cookies and similar technologies to process usage data involves processing the following types of personal data in particular:

- user inputs, in order to remember inputs across multiple sub-pages; (e.g., when processing an "update master data" task in the launched connection process);
- authentication data to identify a user by logging in to the portal in order to remain logged in when navigating to other pages within the portal (e.g., when changing from the "Communication Data" navigation tab to the "User Management" navigation tab);
- security-relevant events (e.g., detection of frequently failed login attempts for an existing user and resulting temporary blocking of this user);
- required data for playing multimedia content (e.g., when playing the provided tutorial videos about the connection processes).

The legal basis for using technical cookies is Article 6(1)(b) GDPR, i.e., we process your data in order to prepare our services as part of initiating and performing the contract.

Recipients/categories of recipient:

Your data will not be passed on to third parties.

Storage time/criteria for determining storage time:

For information on the duration of storage for cookies, see the overview above. If "persistent" is entered in the "expiration" column, the cookie will be stored permanently until the corresponding consent is withdrawn.

**III. Contact form/inquiries by e-mail/phone**

Purposes of the processing/legal bases:

It goes without saying that we treat the personal data which you provide to us when you complete the contact form as confidential. We use your data solely for the limited purpose of processing your inquiry. The legal basis for the data processing is Article 6(1)(f) and Article 6(1)(b) GDPR. Our shared (legitimate) interest in this data processing arises from the objective of answering any inquiries and resolving any issues you may have and thus ensuring and improving your level of satisfaction as a user of our portal.

### Recipients/categories of recipient:

Third parties will not be given access to your data.

### Storage time/criteria for determining storage time:

All personal data we receive from you when you make inquiries via this website or by e-mail will be saved for as long as is necessary to resolve your concern. If you assert your rights as a data subject (see below), your personal data will be stored for three years after the final response in order to document the fact that we provided you with comprehensive information and that the legal requirements have been met.

## **IV. No data transfers to recipients in a third country**

We process your data exclusively within the European Union.

## **V. Rights of data subjects**

### 1. Overview

In addition to the right to withdraw any consent you have granted to us, you have the following additional rights provided the respective statutory conditions are met:

- right of **access** to your personal data stored with us pursuant to Article 15 GDPR and section 34 of the German Federal Data Protection Act (*Bundesdatenschutzgesetz – BDSG*);
- right to **rectification** of inaccurate personal data and the right to have incomplete personal data completed pursuant to Article 16 GDPR;
- right to **erasure** of your personal data stored with us pursuant to Article 17 GDPR and section 35 BDSG;
- right to a **restriction of processing** of your data pursuant to Article 18 GDPR;
- right to **data portability** pursuant to Article 20 GDPR;
- **right to object** pursuant to Article 21 GDPR.

### 2. Right of access pursuant to Article 15 GDPR

Pursuant to Article 15(1) of the GDPR, you have the right to request information, free of charge, on the personal data stored about you. This particularly includes:

- the purposes for which personal data is being processed;
- the categories of personal data that are being processed;
- the recipients or categories of recipient to whom personal data concerning you has been or will be disclosed;
- the planned duration of the storage of the personal data concerning you or, if it is not possible to give any specific details, the criteria used to determine the storage duration;
- the existence of a right to rectification or erasure of the personal data concerning you, a right to request from the controller that processing be restricted or a right to object to this processing;
- the right to lodge a complaint with a supervisory authority;

- all available information regarding the origin of the data if the personal data is not being collected from the data subject;
- the existence of any automated decision-making processes including profiling pursuant to Article 22(1) and (4) GDPR and – at least in these cases – meaningful information regarding the logic involved as well as the significance and the envisaged consequences of such processing for the data subject.

If personal data is transferred to a third country or an international organization, you have the right to be notified about appropriate safeguards pursuant Article 46 GDPR in connection with the transfer.

### 3. Right to rectification pursuant to Article 16 GDPR

You have the right to request the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### 4. Right to erasure pursuant to Article 17 GDPR

You have the right to require us to erase any personal data concerning you without undue delay where one of the following grounds applies:

- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR was based and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21(1) or (2) GDPR, and in the case of Article 21(1) GDPR there are no overriding legitimate grounds for the processing;
- the personal data was unlawfully processed;
- the erasure of personal data is necessary in order to comply with a legal obligation;
- the personal data was collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

Where we have made the personal data public and are obliged to erase it, taking account of available technology and the cost of implementation we will take reasonable steps to inform any third parties processing your data of the fact that you have requested the erasure by such third parties of any links to, or copies or replications of, such personal data.

### 5. Right to restriction of processing pursuant to Article 18 GDPR

You have the right to require us to restrict the processing where one of the following applies:

- you contest the accuracy of the personal data;
- the processing is unlawful and you request the restriction of the use of the personal data rather than its erasure;
- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defense of legal claims or
- you have objected to the processing pursuant to Article 21(1) GDPR pending verification of whether the legitimate grounds of the controller override those of the data subject.

## 6. Right to data portability pursuant to Article 20 GDPR

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that data to another controller without hindrance by us, where

- the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant to Article 6(1)(b) GDPR and
- the processing is carried out by automated means.

In exercising your right to data portability you have the right to have the personal data transmitted directly from us to another controller where technically feasible.

## 7. Right to object pursuant to Article 21 GDPR

**Provided the requirements of Article 21(1) GDPR are met, you may object to the data processing on grounds relating to your particular situation.**

The aforementioned **general right to object** applies to all processing grounds set out in this privacy policy, which are processed on the basis of Article 6(1)(f) GDPR. In contrast to the specific right to object regarding data processing for promotional purposes, we are only obliged to action such general right to object if you cite grounds of overriding importance, e.g. a possible risk to life or health. In addition you have the option to contact the supervisory authority responsible for Lidl Stiftung & Co. KG or the data protection officer of Lidl Stiftung & Co. KG.

## 8. Right to lodge a complaint with the data protection supervisory authority pursuant to Article 77 GDPR

You also have a right to lodge a complaint with the competent data protection supervisory authority at any time. In order to do this you can contact the data protection supervisory authority of the state where you have your place of residence or the authority of the state where the controller is domiciled.

## 9. Exercising your rights

### Points of contact in order to exercise your data protection rights

Do you have any further questions? The company data protection officer for Lidl Stiftung & Co. KG may be reached at: Lidl Stiftung & Co. KG, Data Protection Officer, Stiftsbergstraße 1, 74167 Neckarsulm, Germany, or by e-mail at [datenschutz@lidl.com](mailto:datenschutz@lidl.com).

## VI. Controller

Controller within the meaning of Article 4(7) GDPR for the organization is: Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74167 Neckarsulm, Germany. If necessary, you may reach Lidl Stiftung & Co. KG by phone at +49 (0) 7132 / 94-2000 or by e-mail at [kontakt@lidl.com](mailto:kontakt@lidl.com).