

ACCESS

DATA PRIVACY
NOTICE FOR
DEALERS/
RESELLERS

Data privacy notice for Dealers / Resellers

1. What information does this document contain for you?

In connection with the business relation between you and TK Access Solutions Limited ("TKA" and/or "we") process some personal data. In doing so, we ensure that we comply with the requirements of the General Data Protection Regulation (GDPR) and other applicable data protection laws.

In the following information, we will inform you in detail about how we process your personal data and about your rights.

This Privacy Notice is intended to align with applicable data protection laws in all countries where TK Elevator Group operates. While it is primarily based on the principles and obligations of the EU General Data Protection Regulation (GDPR), references to the GDPR should be interpreted, where appropriate, as reflecting similar concepts under relevant local data protection laws. In jurisdictions where such laws are not in place or are less comprehensive, this Privacy Notice reflects TK Elevator Group's commitment to processing personal data in a manner consistent with the intent and standards of the GDPR, as a global standard for safeguarding data subjects' privacy.

To address specific local legal requirements, this Privacy Notice includes references to country-specific data protection laws that impose obligations beyond, or in addition to, those set out in this global notice. These jurisdictional addenda ensure that the processing of personal data complies not only with global standards but also with any mandatory local regulations applicable in the countries where TK Elevator Group operates. To read specific local legal requirements see Annex 1.

2. Who is responsible for the data processing and who is the data protection officer (DPO)?

2.1. The Controller for the data processing is:

TK Access Solutions Limited

Unit E3 De Havilland Avenue

Preston Farm Business Park

Stockton-on-Tees

TS18 3TB

United Kingdom

E-Mail: tka_uk_gdpr@tkelevator.com

Dealer/ Reseller is a person or company that sells goods or provides services directly to consumers or businesses. It also includes subcontractors and distributors.

GDPR for Europe and UK GDPR for United Kingdom

2.2. The Data Protection Officer can be reached at:

TK Access Solutions Limited

Unit E3 De Havilland Avenue

Preston Farm Business Park

Stockton-on-Tees

TS18 3TB

United Kingdom

E-Mail: tka_uk_gdpr@tkelevator.com

3. Scope and amendments to this privacy statement.

3.1. This privacy notice applies to the processing of personal data of individuals who, on behalf of their company, act as dealers / resellers for TKA.

3.2. We reserve the right to amend this privacy notice periodically to reflect any future changes in the collection and processing of personal data.

4. Which data categories do we use and where do they come from?

a. Angegebene Liefertermine sind lediglich The personal data processed may come from the following sources:

4.1. From you, when you provide us with your information.

4.2. From your Employer Company when they provide us with your personal data on your behalf.

4.3. From your use of our IT systems, this includes data collected through interactions with our digital platforms, such as login information.

4.4. The information processed is limited to the information necessary for your business activities as dealer/ reseller of TKA's products or services and it may involve, without being exhaustive, the following categories of personal data:

4.4.1. Identification and contact details: corporate email address; first name; last name; and mobile phone.

4.4.2. Employment information: Manager, Business Contact Information (city, address, location, country code, time zone).

4.4.3. Professional experiences: certificates, qualifications, trainings, work experience and previous job performance.

4.4.4. Technical data: protocol information, log data that is generated when using our IT systems and machines, etc.

5. For what purposes and on what legal basis is data processed?

If you are freelancer and/or acting on behalf of your Company, we have legitimate interest to process your data on the basis of the performance of a contract and the fulfillment of legal obligations (Article 6 paragraph 1 lit. b and c GDPR) arising from the contractual relationship between TKA and our Dealers / Resellers.

Depending on your role, this may include the processing of your personal data with the following purposes:

5.1. Management of the contractual and commercial relationship with dealers and resellers (e.g., handling of enquiries and quotations, order processing and order management, invoicing and payment processing, etc.).

5.2. Complaints and warranty processing

5.3. Verify the experience and professional qualification of our dealers / resellers and its employees to ensure they meet the requirements for acting as dealers / resellers of TKA's products and services and, when legally required, confirming that employees have received specific training, such as safety training.

5.4. Compliance, integrity and risk management purposes, including the performance of due-diligence, anti-money laundering (AML), sanctions, fraud-prevention and conflict-of-interest checks, which may involve limited profiling activities. Such profiling consists of risk-based assessments and categorisation carried out only in relation to a limited group of individuals, such as ultimate beneficial owners (UBOs), legal representatives, authorised signatories or other persons in key or control-relevant roles, based on predefined compliance criteria (e.g. role, ownership or control structure, geographic factors or transaction-related risk indicators). These activities do not result in decisions based solely on automated processing, and are subject to human review, in particular where dealers, resellers or business partners are individuals or freelancers.

5.5. Registration of dealers / resellers in our IT systems to carry out procedures related to dealer relationship management (delivering, invoicing, etc.).

5.6. Sending invitations to signatories to sign, confirm and/or validate the relevant documentation, such as contracts or binding documents.

5.7. Any communication purpose related to the performance of dealers / resellers activities for TKA.

5.8. When legally required for the provision of specific services to TKA, assign and provide dealers / resellers with trainings necessary for the performance of dealer / reseller activities

5.9. When necessary for the provision of services, assign dealers / resellers with licenses and access to TKA's systems according to the business requirements.

Furthermore, we process personal data in order to safeguard the following legitimate interests of us or third parties (Article 6 paragraph 1 lit. f GDPR). In doing so, we initiate a comprehensive balancing of interests to ensure that your interests are safeguarded. This includes the

following purposes:

5.10. Investigate potential frauds or suspicious behavior in the organization which may include transactions analysis and computer forensics (logs analysis, emails, documents, texts messages...).

5.11. Ensure network and information security by monitoring and protecting our IT infrastructure from unauthorized access, managing cyber threats, and addressing data breaches. This also involves implementing business continuity plans and incident response strategies, as well as processing information about your use of our IT systems, including login times, access logs, and activity records.

5.12. Access and exit control to premises or work sites, which may include the processing of your imagen (photography) when access to certain workplaces requires an image badge.

5.13. Assertion, application or defence of legal claims.

5.14. Invite our dealers / resellers to event and social initiatives organised by the TKA Group.

Except as for the profiling necessary for compliance, integrity and risk management purposes as described in section 5.4., no automated decision-making or profiling of data will be carried out for the above-mentioned purposes.

If we need to process your data in a different way or for purposes not mentioned in this privacy notice, we will notify you in advance and, if necessary, obtain your consent.

6. Who receives your data?

6.1. Within the Controller, only persons and departments that require access to dealers'/ resellers' personal data for the above-mentioned purposes (e.g. Sales and Distribution Team, IT Support team, etc.) receive your personal data.

6.2. Within our group of companies, some of your data is transferred to specific locations within the Group (Corporate/business area/group companies) if they perform centralized data processing tasks for the Group's affiliated companies (e.g., IT Security team, Global Workplace team, etc.). The transmission of personal data to the TK Elevator Group is carried out under the legitimate interest of TK Elevator Group (recital 48 GDPR). Moreover, some business processes related to IT Service Management, in which your personal data may be involved, are carried out by TK Elevator Group of Entities as Data Processors (article 28 GDPR) or Joint Controllers (article 26 GDPR). TK-Elevator group have undertakings located outside EU/ EEA, therefore your data can be transferred outside Europe, for such data transfers standard contractual clauses have been adopted (Article 46 paragraph 2 lit. c GDPR).

6.3. External services providers with whom TKA has contracted the provision of services and are obligated by data processing agreements under data protection regulation to fulfil their data protection obligations. Some service providers can be located outside EU/ EEA, therefore standard contractual clauses have been

adopted and/or Adequacy Decision may be in place.

7. How long will your data be stored?

7.1. We process your personal data as long as it is necessary for the above-mentioned purposes while you are acting as a dealer / reseller of TKA. Once the contractual relationship between you and dealer / reseller and TKA is terminated the information will be retained for the time necessary to comply with legal requirements.

8. Which data protection rights can you claim as the person affected?

8.1. You have the right to information about the personal data in question and the right to rectification, erasure, restriction of processing and data portability, and in the case of processing in accordance with Art. 6 (1) (e) and (f) GDPR the right to object to processing.

8.2. Insofar as you have provided us with your consent to process your personal data in accordance with Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR, you can withdraw this consent at any time without affecting the lawfulness of processing based on your consent prior to its withdrawal. You have the right to complain to the supervisory authority.

8.3. If you would like to exercise any of these rights, please send a written request explicitly specifying your query to the Data Protection Officer (see contact details in point 1.2).

8.4. You also have the option to file a complaint with a data protection authority, Art. 77 GDPR. The data protection authority responsible for us is:

Information Commissioner's Office -Ico.

Wycliffe House, Water Lane,

Wilmslow, Cheshire, SK9 5AF

United Kingdom

phone: +44 (0) 303 123 1113

icocasework@ico.org.uk



ABOUT US

Access BDD is one of the world's leading suppliers of stairlifts and platform lift solutions.

CONTACT

TK Access Solutions
Limited

Access BDD
Unit E3 Eagle Court
De Havilland Avenue
Stockton-on-Tees
TS18 3TB

+44 1642 853 650
[accessbdd.com](https://www.accessbdd.com)

