

## Privacy Notice – Digital Solutions

### TÜV Rheinland Industrial Services Limited

#### 1. Introduction

TÜV Rheinland Industrial Services Limited is part of the TÜV Rheinland Group. We take the protection of your personal data very seriously and process it in accordance with all applicable data protection laws. This privacy notice (the "Notice") is designed to provide you with an overview of how we process your data in relation to our digital solutions, such as software, and of your rights regarding that processing.

Your relationship to our organisation mainly determines which data in particular are processed or used by us. For this reason, some parts of this Notice may not apply to you.

**Please note: this Digital Services Notice relates to how we process your personal data in relation to digital solutions such as software specifically. Please also see our [Data Privacy Declaration](#) for information about how TÜV Rheinland Group processes your data when you visit its websites.**

#### 2. Data Controller and Regional Data Protection Officer

TÜV Rheinland Industrial Services Limited (also referred to as "we", "us" or "our" in this Notice) is the data controller and is responsible for processing your personal data.

We have appointed a Regional Data Protection Officer and additionally a contact person for data protection matters in the UK who are responsible for this Notice and to whom you can send your queries about this Notice, including requests to exercise your legal rights at:

TÜV Rheinland Industrial Services Limited

FAO: Data Protection

Pavilion 9 Byland Way

Belasis Business Park

Billingham TS23 4EB

United Kingdom

Email: [privacy-tris@tuv.com](mailto:privacy-tris@tuv.com)

#### 3. The types of personal data we collect

Personal data means any information about an individual from which that person can be identified. We process (for example, collect, use, store and transfer) the following kinds of your personal data in relation to our digital solutions offering:

- **Personal identification data and contact details** (includes title, name, email address, telephone number, address);
- **Payment and other financial data** (includes bank account details);
- **Technical Data** (your login data, operating system and platform, device ID and other technology on the devices you use to access this website);

- **Marketing and sales data** (includes your marketing and communication preferences, interest in our products and services, information on consents you have granted or objections you have lodged).

#### 4. The legal basis for data processing

We will only process your personal data where there is a legal basis for doing so. We rely on one or more of the following legal bases:

- **Performance of a contract between parties** - where we need to perform the contract we have entered into with you or to perform pre-contractual measures such as issuing a proposal.
- **The exercise of our legitimate interests** - we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) and do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Examples of legitimate interests may include:
  - Giving you a secure customer experience;
  - Building and maintaining relationships with clients, suppliers, partners, employees and all other stakeholders;
  - Managing our risks, maintaining accurate records and operating our business efficiently;
  - Ensuring a personalised appeal and tailored offerings;
  - Improving and developing intelligent and innovative services and products;
  - Data processing and analysis for creating automated evaluations e.g. as the basis for price adjustments;
  - Assertion of legal claims and defence in case of legal disputes;
  - Ensuring IT security and IT operations;
  - Processing of incoming requests from interested parties and non-customers.
  - Preventing fraud.
- **Your consent** – we ask for consent where this is required by law, such as in relation to the use of cookies, or where we have obtained your active agreement to use your personal data for a specified purpose (e.g. where you subscribe to an email newsletter). You are able to withdraw your consent at any time. You can do this by contacting us (see contact details in section 2).
- **The performance of a legal obligation** - we may use your personal data where it is necessary for compliance with a legal obligation that we are subject to.

#### 5. How we use your personal data

The table describes the ways we plan to use the different categories of your personal data and which lawful bases we rely on for each:

Purpose/Use	Type of data	Legal basis
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

<p>To process and deliver services you order:</p> <p>(a) Issuing proposals</p> <p>(b) Coordinating the delivery of services, including training events</p> <p>(c) Contract management</p> <p>(d) Manage payments, fees and charges</p> <p>(e) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To notify you about changes to our terms or this Notice (or other applicable privacy policy)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p>
<p>To deal with your requests, complaints and queries</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p>
<p>To provide helpdesk services for the resolution of technical issues.</p> <p><b>Please note that we share your personal data with Freshworks Inc. and its affiliates including Freshworks Technologies UK Limited, our external service provider of helpdesk solutions.</b></p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Technical</p> <p>(e) Usage</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to investigate and resolve your technical queries and problems in a timely and effective manner)</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p>

	<p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and communications</p>	<p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Consent, having obtained your prior consent to receiving direct marketing communications</p>

	(f) Marketing and communications	
As required by applicable law, including lawful requests from law enforcement agencies, regulators or other authorities	All	The performance of a legal obligation
External auditing	All	Necessary for our legitimate interests (i.e. periodic visits from certified auditors with access to all data)

## 6. Disclosing your personal data

We may share your personal data with the parties set out below only where necessary for the purposes described in the table at section 5:

- Other TÜV Rheinland Group companies
- Service providers, such as providers of IT and telecommunications services. These include the specific third parties set out in the table at section 5, namely:
  - Freshworks, Inc. And its group companies
- Credit agencies
- Insurance providers
- Professional advisors (including legal advisors and auditors)
- Law enforcement, government agencies and other recipients as required by applicable law
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. International transfers

We may share your personal data within the TÜV Rheinland Group and to external service providers that carry out certain functions on our behalf. This may involve transferring your data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to TÜV Rheinland Group or external service providers, we ensure a similar degree of protection is afforded to it by ensuring that one of the following safeguards is in place:

- Transfer of your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data.
- Using specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK.
- Country-specific schemes that have been approved by use by the Information Commissioner's Office, such as the UK Extension to the EU-U.S. Data Privacy Framework.

If you would like more information about the safeguards we use, please contact the Data Privacy contact person using the details in section 2.

## 8. Period of retention

As required by applicable data protection law, we may only retain your personal data for a minimum period of time. We will retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In order to determine the applicable retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

## 9. Your data protection rights

Under data protection law, you have certain rights in relation to your personal data. Specifically, you have the right to:

Your right	Description
The right to access your personal data (also known as a "subject access request")	You may receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
The right to correction	You may have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
The right to erasure	You may ask us to delete or remove personal data when we no longer need to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or

	where we are required to erase your personal data to comply with local law.
The right to request restriction of processing	You may ask us to suspend the processing of your personal data in certain scenarios.
The right to data portability	You may ask us to provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
The right to object	You may object to processing where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data.
The right to withdraw consent	You may withdraw any consent you have provided where this is the lawful basis for our processing. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Please also note that if you withdraw your consent, we may not be able to provide certain products or services to you.

Please note that the rights described above are not absolute, and we may not be able to satisfy your request. For example, we may be legally or contractually required to retain certain personal data or we may be able to evidence compelling legitimate grounds for processing that overrides your right to object.

Please contact the Data Privacy contact person as set out in section 2 to request to enforce these rights.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues in case you consider your rights infringed.

See the ICO website at [www.ico.org.uk](http://www.ico.org.uk).

## **11. Visiting TÜV Rheinland Group websites and our use of cookies**

As described in section 1 of this Notice, you should refer to the [Data Privacy Declaration](#) for information about how TÜV Rheinland Group processes your data when you visit its websites.

This includes information about cookies used on our sites.