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## EMEA Business Partner Privacy Notice

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice describes how we use, process, disclose and protect personal information that we collect about you in connection with products and services that we buy from our suppliers or that we sell to our customers (in this notice, collectively, “business partners”) in Europe, Middle East and Africa or, simply “EMEA”.

We refer to individuals whose personal information we process, such as individuals who work for or are otherwise engaged by, or interact with, our business partners as “you” in this notice.

Anixter Group is made up of different legal entities and this notice is issued on behalf of the group, so when we mention “Anixter”, “we” or “us” in this notice, we are referring to the relevant Anixter Group company responsible for processing your personal information. When a business partner enters into a contract with our group entity, that entity would be the controller. With respect to the EMEA HQ functions, such as marketing, the controller is Anixter Limited, whose details can be found in the “Who to contact” section of this notice.

### WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

Personal information, or personal data, means any information about an individual from which that person can be identified.

During the course of our relationship with a business partner we may collect, store and use, the following categories of personal information:

) Identity information

For example, name, telephone number, email, employer name, employer address, industry, occupation, languages, date of birth.

) Logical identifiers

For example, username, password, activity log.

) Financial information

For example, bank account information, credit/debit card information, results of credit checks.

) Security

For example, user ID and passwords to access premises, IP address.

) Reporting

For example, personal information received through our hotline.

) Communications

For example, emails, voicemails, correspondence, text messages.

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) Profile

For example, occupation, profession, industry, training programmes attended.

We do not typically collect sensitive or special category personal information during our interaction with business partners. Please do not send us personal information about racial or ethnic origin, political opinions, religion or other beliefs, health, biometric or genetic characteristics, criminal background or trade union membership, unless we specifically ask for that information or your interaction with us necessitates disclosure of such information, for example, through our Business Integrity Line.

## HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect personal information during the course of our commercial relationship with a business partner. This is done using different methods:

) Directly from an individual

For example, as part of business partner account setup, when an order is placed by an individual in our business partner's procurement team, through our website and webforms, via email or telephone or in-person.

) From a business partner

For example, when a business partner provides contact detail of their accounts payable team or when a business partner provides us with a lead to potential client.

) From other sources

For example, when we run credit checks or restricted party list checks or collect information from government agencies or public sources. We also collect personal information when you visit events or trade shows.

## HOW AND WHY DO WE USE YOUR PERSONAL INFORMATION?

- **"Lawful bases" for processing your personal information**

We will only use your personal information where the law allows us to do so. The privacy laws set out a number of different reasons for which we may process personal information. Typically, we will rely on the following "lawful bases":

) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

For example, if you have attended an event organised by us and we collect your business cards for subsequent networking.

) Where we need to comply with a legal or regulatory obligation.

For example, where we are required to check that an individual is not under US or EU sanctions.

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) Where we need to perform the contract we are about to enter into or have entered into with you.

Although we are primarily a B2B distributor, there may be occasions where individuals enter into contracts with us. For example, if we enter into a contract with a consumer or with an individual contractor, we may need personal information to perform that contract.

We rely on consent as lawful basis for processing only in specific circumstances. Where we do rely on consent, the relevant form will provide information on when consent is sought. Usually, this will be the case in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

- **Purposes for which we use your personal information**

We will use your personal information for one or more of the purposes set out below. We have grouped the activities relevant to each section into easy to navigate lists and, for clarity, included examples where or how personal information may be used during each activity.

) To complete transactions with the business partners.

This includes all activities that are required as part of our relationship with a business partner.

*List of activities*

- Accounts Payable: when we pay our business partners we often use personal information of the business partner's accounts team such as name, email and telephone number.
- Accounts Receivable: when we receive funds, we need personal information of the business partner's accounts payable team.
- Contractor Management: when we outsource work, we need personal information to manage that work.
- Costing: when we calculate cost of running our business.
- Customer Billing: when we send invoices to business partners for goods and services, they are often marked FAO a specific individual.
- Business Partner Onboarding: when we set up an account for the customer, we may need key contact details or personal information to run credit checks.
- Distribution: when we make the product or service available for a business partner.
- Order entry, fulfilment, packaging and processing: when our business partner places an order to delivery, we use personal information to fulfil that order.
- Purchasing: when we buy products and services from our business partners or for them.

) To comply with the law.

This includes complying with our legal obligations, such as international trade obligations (e.g. sanctions and restricted party lists) or storage limitation (records retention).

*List of activities*

- Business Partner Record Management: when we need to control, use and destroy records of business activities and transactions.

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- Trade Compliance: when we need to ensure that our goods and services are not sold in breach of the law, such as US or EU sanctions.

) To grow our business.

This includes marketing communications, customer relationship management and analytics.

*List of activities*

- Customer service: when we reply to business partners' queries, provide advice and assistance.
- Data Analytics: when we use quantitative and qualitative techniques and processes to enhance productivity and business gain, such as conducting analysis of habits of our website users.
- E-Marketing and marketing: when we email or mail you, or advertise products and services on the web or through other media.
- Learning & Development: when we provide training to our business partners.
- Reporting: when we collect data to analyse it.
- Sales: when we sell our products and services.

) To administer and protect our business.

This includes activities you would usually expect when running the business

*List of activities*

- Enterprise security: when we need to protect our websites or physical sites, for example through CCTV recording.
- Freight and Inventory Management: when we need to manage costs, deliveries and maintain adequate inventory levels.
- IT Support / Help Desk: when we need to support business partners or react to cyber threats.
- Payment collections: if a business partner has not paid us, we will use personal information to recover debt.
- Pricing: when we determine the price of a product or service.
- Product Management: when we deal with planning, forecasting and production, or marketing of a product or products at all stages of the product lifecycle
- Risk Management: when we use data for forecasting and evaluation of risk.
- Supply Chain Management: when we manage the process of delivering goods and services from purchase to storage and delivery.
- Vendor Management: when we obtain quotes, source products, manage relationship, negotiate contracts.

The above purposes for using your personal information will overlap and, therefore, multiple purposes may justify our use of your personal information. The activities may also overlap within those purposes.

- **If you do not provide your personal information**

If you do not provide personal information that we request, we may not be able to provide products or services that a business partner requests and may not be able to buy certain products or services. You will also not be able to receive targeted offers and other relevant communication. On rare occasions, if we

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enter into a contract with you, without personal information that we need, we may not be able to perform that contract.

- **Change of purpose**

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a different purpose, we can use it provided we reasonably consider that such different purpose is compatible with the original purpose.

- **Automated decision-making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. At Anixter, where personal information is processed by automated means, there usually is human intervention. If this approach changes, we will notify you.

## WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

- **Categories of recipients of personal information**

We sometimes share personal information with the following categories of third parties:

) **Anixter Group**

Personal information may be shared with other entities within the group that provide shared services, such as accounts payable and receivable and purchasing. The shared services for EMEA are located mainly in UK, Belgium and USA.

) **Service providers and suppliers of goods**

For example, the information may be shared with suppliers of products, transportation companies and others companies involved in fulfilling your or business partner's orders. We may also pass personal information to suppliers, who participate in events and trade shows as sponsors or whose products may be relevant to you.

) **Professional advisers**

We may need to share information with our lawyers, accountants or other professional advisers.

) **Regulators and other authorities**

It may be necessary to provide personal information to, for example, tax authorities.

Where we disclose personal information to a service provider or other processor, we require them to take adequate security measures to protect your personal information in line with our policies and the law. We only permit such third parties to process your personal information for specified purposes and in accordance with our instructions.

If your personal information is shared with third parties for their own purpose, then this will be done in very specific circumstances.

For example, where you attend an event sponsored by our partners and accept that we may share your contact details with event sponsors.

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#### - International data transfers

We are proud of our global presence. That inevitably means that some of your personal information is transferred cross borders, mainly to our headquarters in the USA.

If we transfer your personal information outside the EEA, the EU legislation requires us to ensure your personal information is adequately protected outside EEA. To ensure such protection we have put in place intra-group EU Model Clauses.

External third parties with whom we share personal information may be based outside EEA. In that case, we have processes in place to ensure that your personal information is adequately protected. For example, our contracts with third party processors include provisions that they must follow to ensure adequate protection of your personal information.

### HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We will take reasonable steps to maintain physical, procedural, and technical security in our offices, information systems, and information storage facilities in order to protect your personal information from loss, misuse, unauthorised access, erroneous disclosure, alteration or destruction. We restrict access to personal information to those individuals who need access to it in performing our duties and obligations.

### HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

We will only keep your personal information for as long as is necessary for the purpose for which it was collected. That includes satisfying any legal, accounting, or reporting requirements. At the end of the retention period, personal information is deleted or anonymised.

### WHAT ARE YOUR RIGHTS OVER YOUR PERSONAL INFORMATION?

In certain circumstances, you have the right to:

- ) **Request access** to personal information that we hold about you.
- ) **Request correction** of your personal information when incorrect, out of date or incomplete.
- ) **Request erasure** of your personal information. You may exercise this right, when there is no good reason for us continuing to process personal information about you. Note that we may not always be able to remove your personal information for specific legal reasons which will be notified to you.
- ) **Object to processing** of your personal information where we are relying on a legitimate interest. You also have the right to object where we are processing personal information for marketing purposes. In some cases, we may demonstrate that we have compelling legitimate ground to process your personal information which override your rights.
- ) **Request the restriction of processing** of your personal information. This allows you to ask us to suspend processing of your personal information. For example, where you wish to establish that personal information that we hold about you is accurate.
- ) **Request the transfer** of your personal information to you or to a third party in a commonly used machine-readable format. Note that this right applies in limited circumstances, where personal information is processed *by automated means* on the basis of consent you provided or contract we entered into with you.
- ) **Stop consent based processing** of your personal information. If we collected personal information on the basis of consent, you have the right to withdraw consent. If you withdraw your consent, we may not be able to provide certain products or services to you and will advise you if that would be the case.

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If you want to exercise any of the above rights, please contact us.

Please note that you will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive or we may refuse to comply with your request in such circumstances.

When you exercise your rights, we may request information from you to confirm your identity. This is to ensure your personal information is not disclosed to any person who has no right to receive it.

## WHO TO CONTACT?

We hope that this notice has been helpful, but if you have questions or wish to exercise your legal rights, please contact our Chief Compliance Officer by emailing us at [dataprivacy@anixter.com](mailto:dataprivacy@anixter.com).

If you do not have access to an email you may write to us at Chief Compliance Officer, Anixter Inc, 2301 Patriot Blvd, Glenview, IL, 60026 or to our EMEA HQ FAO Legal Department, Anixter Limited, Easthampstead Road, Bracknell, Berkshire, RG12 1YQ, United Kingdom.

You also have a right to make a complaint at any time to a supervisory authority in your country.