

GDPR Privacy Notice to Customers and Vendors

Under this privacy notice (hereinafter the “**Notice**”), **Blue Sky Industries (Europe) Ltd** (hereinafter “**We**” or “**Us**”) informs you how We process your personal data. Your personal data means any information relating to you (hereinafter the “**Personal Data**”). This Notice relates to our customers and suppliers (to the extent individuals) and employees/contractors of Our customers and suppliers.

1 Identity and Contact details of Us and of Our Data Protection Officer

We are: **Blue Sky Industries (Europe) Ltd**, Unit 2, West Side Park, Belmore Way, Derby DE21 7AZ. telephone: +44 330 016 7555.

Our data protection officer is: **Jonathan Morgan**, Unit 2, West Side Park, Belmore Way, Derby DE21 7AZ. telephone: +44 330 016 7555. Email: data-protection-officer@blueskyindustries.com

2 Purpose, Categories of Personal Data, Legal Basis and Retention

2.1 Categories of your Personal Data and purposes of Our processing

We process the following categories of your Personal Data for the following purposes:

Your business contact details (e.g. name, position, business email address, business telephone number, department) and your business function for the purposes of (1) communication by email, telephone or otherwise;

(2) customer/supplier relationship and contract management (including managing airfreight, truck and sea shipments);

(3) enterprise resource planning as well as managing demand and purchasing of products;

(4) order processing and acknowledgement;

(5) payment and invoicing as well as business accounting;

(6) business intelligence (business planning and reporting) and quality assurance;

(7) kitting and bin management;

(8) network file sharing; and

(9) physical archiving and backup as well as shredding of physical documents/files.

For the same purposes, your business contact details and any other personal information of you contained in emails sent by you or others to Us.

2.2 Legal basis for Our processing of your Personal Data

Our processing of your Personal Data is allowed by law. The corresponding legal basis is (from May 25, 2018 onwards) Art. 6 para. 1 lit. (f) of the General Data Protection Regulation EU 2016/679 (GDPR), permitting the processing of Personal Data for the purposes of Our legitimate interests. To the extent a customer or supplier is an individual, the legal basis is Art. 6 para. 1 lit. (b) GDPR instead, i.e. the

processing of Personal Data is permitted for the purpose of the performance of a contract.

As to Your business contact details processed for the purposes set out in Sec. 2.1(1) to (8) and any other Personal Data contained in emails, We are permitted to process your Personal Data as such processing is necessary for Us to pursue Our legitimate interests. The performance of the contract concluded between Us and your employer is not possible without processing the respective Personal Data of you. We only process Personal Data necessary for the reasonable performance of the contract. We will not process any of your May 9, 2018

Personal Data beyond the purpose of reasonably performing the contract. There are no overriding interests apparent that would require Us to exclude the processing of your Personal Data. In fact, you will yourself be interested in Us processing your Personal Data to the extent necessary for the reasonable performance of the contract as you may otherwise not fully comply with your own employment relationship with your employer.

As to your business contact details processed for the purposes set out in Sec. 2.1(9), We are permitted to process your Personal Data as such processing is necessary for Us to pursue Our legitimate interests. Statutory retention periods dictate Us to store and archive business materials. Furthermore, We need to ensure due to legal reasons (in particular, applicable data protection laws) that certain information not necessary to be retained (anymore) will get deleted and/or shredded. Involving professional third-party service providers to conduct the archiving/backup and deletion/shredding is a reasonable action given Our size and the magnitude of files / documents we need to handle. Furthermore, We have contractually ensured that the service providers will only process Personal Data to the extent absolutely necessary for providing their services. There are no overriding interests apparent that would require Us to exclude the processing of your Personal Data. On the one side you will yourself be interested in Us processing your Personal Data to the extent necessary for the reasonable performance of the contract (which includes archiving and backing up data in accordance with applicable statutory retention periods) as you may otherwise not fully comply with your own employment relationship with your employer. On the other side and regarding the deletion and shredding of documents, you will also be interested in Us deleting any files and/or documents potentially containing your personal data as, thereafter, such data cannot be accessed by other persons anymore.

2.3 Do you have to provide your Personal Data to Us?

The provision of your Personal Data is not a statutory or contractual requirement.

This means that you are not obliged to provide your Personal Data to Us.

The consequence if you do not provide your Personal Data to Us is simply that We will not be able to communicate with you and may potentially not be able to fully proceed with Our business relationship with you and your employer.

2.4 Do We make automated decisions on you?

We do not make any automated decisions solely on automatic processing, including profiling, which would produce legal effects concerning you or similarly significantly affect you.

2.5 Sources from which We have obtained your Personal Data

Besides from yourself, We may have obtained your Personal Data set out in Section 2.1 above from the following sources: Other colleagues of you, e.g. if they step in for you in case of illness, holiday, etc.; email chains of others may contain business contact details of you (e.g. with regard to past orders), being sent from EU countries as well as non-EU countries depending on the sender/recipient. These sources are not publicly accessible.

2.6 Retention periods

The retention periods for Personal Data depend on the respective purpose the Personal Data are processed for and the respective tool such data are processed in. It is not possible to outline the various retention periods in a reasonably intelligible format under this notice. The criteria used to determine the applicable retention period are that We will retain Personal Data set out under Sec. 2.1 above for as long as (i) necessary for the respective purpose, (ii) necessary to carry out Our business relationship with you, (iii) you have consented to, and/or (iv) required by applicable statutory retention laws. May 9, 2018

3 Transfer of Personal Data to Third Parties

3.1 Transfer of your Personal Data to third parties

We transfer your Personal Data referred to in the left column to the following third parties referred to in the right column: Personal Data set out in Sec. 2.1	Third Parties
Third-party IT service providers for purposes of IT hosting, operation and support	
(1) to (7) and personal data contained in emails	Blue Sky Industries, Inc. (USA): Parent Company
(1) and personal data contained in emails	Google (USA): IT industry
Other third-party service providers for being provided with the respective services	
(2) to (7), (9)	SolarWinds MSP UK Ltd. (United Kingdom): IT industry (data archiving and backup services)