

## Coloplast Distributor Due Diligence Privacy Notice

This Privacy Notice explains what kind of personal data is collected and how it is being used in view of our Distributor Due Diligence process (herein after referred to as the “DD process”). The purpose of the DD process is to review compliance and business integrity level of our business partners. Coloplast wishes to only engage third parties that are reliable and who do not conduct any improper activities and for these purposes Coloplast subjects third parties to a DD process on a case by case basis.

**Please note:** *The responsibility for disclosing personal data of other persons to Coloplast rests with you; we will therefore assume that you have all necessary rights to deal lawfully with the personal data in question under relevant data privacy protection law.*

*We encourage you to share this Privacy Notice with all persons relevant to this DD process.*

### Purposes of processing personal data

Coloplast is obliged by law to document that its distributors conduct business in an ethical manner. The purposes of the DD process is to review distributor’s compliance and business integrity level as well as to assure business activities are conducted in an ethical and transparent manner. To do so, Coloplast has to make informed decisions about the potential risks presented by third parties with whom we consider conducting business. Personal data is processed to achieve these purposes. By implementing a DD process, Coloplast aims to minimize the risks of acting in breach of its own BEST Code of Conduct and applicable laws and regulations.

### Legal basis for processing personal data

We process personal data in the context of the Due Diligence process to ensure our compliance with applicable laws, such as UK Bribery Act and U.S. Foreign Corrupt Practices Act, which Coloplast is obliged to endorse, that have a global outreach and are thus applicable to all distributors regardless of location. Coloplast is held accountable for any misconduct of its partners, and it is therefore in Coloplast’s **legitimate interest** to ensure that we only conduct business with reliable third parties who do not conduct any improper activities and who meet our company standards.

### What personal data might be processed in the context of the Due Diligence process:

The DD Process takes the form of a questionnaire, which is to be filled out by the distributor. Together with other information obtained through publicly available sources, Coloplast will make a review of the questionnaire and will make a decision on whether or not we can engage your organization or renew our business cooperation.

During the review process, we will process data as follows:

1. Coloplast uses your contact details such as first name(s), last name and email address to send you our due diligence questionnaire and to communicate with you in relation to the completion of the questionnaire.
2. In the questionnaire, we may for example ask for:
  - names of the designated representatives, owners of the company, members of the board of directors, members of top management (e.g., CEO, CFO, COO), shareholders and related companies
  - evidence of existence and registration; corporation registration documents may include personal data like name, date of birth of legal and real owners, shareholders and other legal affiliates as well as top management.
  - details and copy of relevant licenses or permits required to conduct business with us; these may include picture, name and date of birth.

Coloplast will never require sensitive and confidential information, which is illegal to ask for and which is against competition regulations.

3. We screen companies we consider conducting business with and our screening tool may show records found of the company, including of individuals affiliated with the company, such as CEO's or CFO's, where such information is publicly available.
4. If we deem it necessary for the purposes mentioned above, we may also screen an individual related to your company. To do this, we process first name(s) and last name and, to the extent available to us, other personal data that can eliminate the individual from any false-positive hits provided by our screening tool, such as middle name, alias(es), email address, date of birth, gender, job title, employer, address details, country of origin, residence and/or citizenship and - in rare cases - social security number, national ID or tax ID (the latter numbers only to the extent allowed by applicable law).

## **Retention of personal data**

Personal data processed in the context of the DD process will generally be retained for (a) 5 years after the decision to not enter into a business relationship; and (b) 10 years after the end of the business relationship with the third party. Personal data may be stored for longer if Coloplast is obligated to do so by legal or regulatory requirements or if extended retention is necessary in case of a (potential) legal dispute/settlement.

## **Personal data processed by and data obtained via third parties**

Coloplast works closely with relevant trusted partners, including due diligence service providers, who will process the data you disclose on behalf of Coloplast. From the trusted partners, Coloplast may also receive personal data about you and other persons related to your company, cf. above, of relevance to the DD process. Such data obtained from our trusted partners will be kept and retained in accordance with the same duty of care as described in this Privacy Notice, observing any additional restrictions imposed on Coloplast by the trusted partners who shared additional personal data of relevance as described.

## Data Subject Rights

Any data subject, whose personal data is being (a) processed during this DD process and/or (b) stored afterwards, has or may have one or more of the following rights:

- Right to access
- Right to rectify
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability

To exercise any of these rights please send an e-mail to [privacyrequests@coloplast.com](mailto:privacyrequests@coloplast.com). For other queries or questions related to Coloplast's processing of personal data, please refer to the **How to contact Coloplast** section below.

For further data privacy information, please consult Coloplast's Global Privacy Notice here: [Privacy Notice - Corporate \(coloplast.com\)](#)

For more information on our expectations towards distributors, please review Coloplast's Global Distributor Code of Conduct here: [Distributor Portal - Corporate \(coloplast.com\)](#)

## How to contact Coloplast

Coloplast has appointed a Group Data Protection Officer (DPO). Inquires to the Data Protection Officer may be directed to:

E-mail: [dataprotectionoffice@coloplast.com](mailto:dataprotectionoffice@coloplast.com)

Coloplast A/S  
Att: Data Protection Officer  
Holtedam 1,  
DK-3050 Humlebaek  
DENMARK

In case of a dispute regarding Coloplast's data processing, the data subject in question may file a complaint with the relevant supervisory authority, which in Denmark is the Danish Data Protection Agency: [www.datatilsynet.dk/english](http://www.datatilsynet.dk/english)

You can find a complete list of European supervisory authorities here: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## Updates

Coloplast reserves the right to make changes to this Distributor Due Diligence Privacy Notice. These changes will take effect immediately upon posting. For your convenience, the last revised date of the current notice will be posted at the bottom of this page.

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