Privacy policy for business customers and suppliers

With the following information, we would like to give you an overview of the processing of your personal data by us and your rights under the General Data Protection Regulation (Regulation (EU) 2016/679 - "**GDPR**") and the Federal Data Protection Act ("**BDSG**").

This privacy policy applies to personal data of persons with whom we enter into contractual or business relationships, as well as, but not exclusively, of bodies, managing directors, experts, commission members or other employees or representatives of our contractual or business partners, which we process in the context of existing or prospective contractual and business relationships. This includes existing or potential suppliers, service providers, customers, agents or consultants as well as existing or potential co-operation partners or other partner companies.

Processing includes any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means. This includes in particular:

- **Collection and recording:** The collection or recording of personal data.
- **Organisation and classification:** The structuring and classification of data according to specific criteria.
- **Storage:** The retention of data in a system or database.
- **Adaptation or change:** The updating, modification or customisation of data.
- **Readout:** The retrieval or accessing of stored data.
- **Queries:** The collection of information through targeted enquiries.
- **Utilisation:** The processing and use of data for specific purposes.
- **Disclosure:** The transmission, dissemination or other provision of data.
- **Comparison or linking:** The comparison and merging of data from different sources.
- **Restriction:** The restriction of processing or access to data.
- **Deletion or destruction:** The removal or complete destruction of data.
- **Transmission** necessary for the fulfilment of contractual obligations or within the framework of legal requirements.

We take appropriate technical and organisational measures to protect your personal data from unauthorised access, loss or destruction

1. **Responsible person and data protection officer**
   The controller within the meaning of the GDPR for the data processing described in this privacy policy is

   Foundation for International Business Administration Accreditation (FIBAA)
   represented by its management,
   Berliner Freiheit 20-24. 53111 Bonn,
   Phone: +49 228 - 280 356 0 -- Fax: +49 228 - 280 356 20 -- E-mail: info@fibaa.org

   You can reach our data protection officer at
   Attorney Mr Georg Baumann
   Eichholzer Str. 80, 50389 Wesseling
   Phone: +49 2236 92920
   E-mail: baumann@frag-den-dsb.de

2. **Sources and types of personal data**
   We primarily process personal data that the data subjects provide to us themselves in the context of contractual and business relationships or that we receive from the respective contractual and business partners (e.g. from your colleagues with whom we are already in contact), for example in the context of processing an enquiry or an order. We also process personal data that we collect from publicly accessible sources (e.g. commercial register, press, internet) or receive from third parties (e.g. credit agencies, business partners). We will make separate reference to the collection of personal data from third-party sources.

   Relevant personal data includes in particular personal details (e.g. surname, first name, address, bank details, passport details, invoice address, tax number/USt ID) and other contact details (e.g. telephone number, e-mail address). In addition, this may also include contract or order data (e.g. sales data, volumes, planned quantities), data from the fulfilment of our contractual obligations, personal data (e.g. business interests, profession,

industry, position, tasks and authorisations), as well as other data comparable with the aforementioned categories. In addition, communication data (e.g. meeting minutes) and documentation data (e.g. reports, including self-documentation) may also be relevant. In accreditation and certification procedures, this also includes information on teaching staff and other employees of the higher education institution (e.g. academic CVs) that we receive from the institution. The processed data is used exclusively for the purpose for which it was collected. In addition, it may be used for other purposes if this is permitted by law or consent has been given.

3. Legal bases, processing purposes and legitimate interests

3.1. We process personal data for the following purposes or to pursue the following legitimate interests, in each case on the basis of the following legal bases:

Purpose	Processing/authorised interest	Legal basis
Preparation, implementation and processing of contracts with you or your company	• Consultancy agreements (e.g. processing of enquiries, authentication of contractual partners, preparation and signing of contractual documents, execution of invoicing and processing of payments, including the administration and adjustment of contractual agreements); • Services agreements and other contractual relationships (e.g. processing and viewing of corresponding offers and enquiries; authentication of contractual partners, preparation and signing of contractual documents, processing of payments; sending of information letters), including the administration and adjustment of contractual agreements.	Art. 6 para. 1 lit. b and lit. f GDPR
Customer service	Optimum contact support/relationships, also with regard to the employees of our business partners;	Art. 6 para. 1 lit. f GDPR
Own business purposes incl. business process optimisation	• Optimisation of our business processes, e.g. by maintaining a supplier or prospective customer database, also as part of customer relationship management; • Centralisation or outsourcing of corporate functions.	Art. 6 para. 1 lit. f GDPR
Quality management	To monitor and improve the quality of our services, including conducting surveys and collecting feedback.	Art. 6 para. 1 lit. f GDPR
Advertising	Selection of and direct approach with advertising by electronic mail (including newsletters).	Art. 6 para. 1 lit. a GDPR; Art. 6 para. 1 lit. f GDPR in conjunction with. § Section 7 para. 3 UWG

3.2 We also process your data to protect our legitimate interests (Art. 6 para. 1 lit. f GDPR) in the assertion and defence of legal claims, the handling of complaints, the resolution of disputes or the assertion of claims. and the performance of market research, market analyses, statistical evaluations and research in order to improve our products and services and to better meet the needs of our customers.

3.3 Further data processing is carried out on the basis of legal requirements (Art. 6 para. 1 lit. c GDPR): for example, to fulfil tax and other legal control and reporting obligations, as well as audits by tax or other authorities and to comply with legal retention periods.

3.4 We do not use solely automated decision-making, including profiling, within the meaning of Art. 22 GDPR. Decisions on accreditation and certification are made exclusively by the FIBAA Accreditation and Certification Committee on the basis of the experts' report.

4. Recipients of personal data

4.1. Under certain circumstances (in addition to the cases already mentioned above), your personal data may be passed on for the above-mentioned purposes; in detail:
- Disclosure takes place if this is necessary for the enforcement of contractual regulations.
- If it is necessary to investigate or prosecute unlawful or abusive behaviour, personal data will be forwarded to our legal advisors, the law enforcement authorities and, if necessary, to injured third parties. However, this only happens if there are concrete indications of unlawful or abusive behaviour.
- Disclosure may also take place if this serves to enforce contractual provisions between us and our contractual and business partners.

4.2. We are also legally obliged to provide information to certain public authorities on request. These are primarily law enforcement authorities, authorities that prosecute administrative offences subject to fines and the tax authorities.

4.3. If it is necessary for the processing of your enquiry or the conclusion or execution of a contractual or business relationship with you, as well as in the case of centralised or outsourced corporate functions, your data may be passed on to companies affiliated with us for the fulfilment of the above-mentioned purposes.

4.4. Occasionally, in order to fulfil the purposes described in this Privacy Policy or to provide our services, we rely on contractually affiliated third-party companies or other cooperation partners and external service providers, such as brokers, logistics companies, IT service providers, business consultants and financial institutions, which may be based outside the EU or the EEA. In such cases, information is passed on to these companies or individuals to enable further processing. If these are organisations outside the EU or the EEA, we ensure an adequate level of data protection by means of an adequacy decision of the European Commission (Art. 45 GDPR) or by concluding the EU Standard Contractual Clauses (Art. 46 para. 2 lit. c GDPR). You can request a copy of the respective safeguards from our data protection officer.

4.5. **Use of AI-based services:** To support internal work processes, such as drafting, editing, structuring and summarising texts, we use the AI service Claude provided by Anthropic Ireland, Limited, Dublin, Ireland, as a processor pursuant to Art. 28 GDPR. Data may be processed by Anthropic, PBC and its sub-processors in the USA; this transfer is based on the EU Standard Contractual Clauses (Art. 46 para. 2 lit. c GDPR). Inputs are not used to train AI models. We do not enter special categories of personal data within the meaning of Art. 9 GDPR or CVs of teaching staff into AI-based services.

5. Processing time

We process your personal data and personal data provided to us by you for the duration of the fulfilment of the service provision. Personal data is stored for the period specified by the applicable statutory retention periods. After these periods have expired, the corresponding data is routinely deleted, provided it is no longer required for the fulfilment or performance or warning of a contract.

6. Rights of data subjects

6.1. You have **the right to** receive **information** about the personal data stored about you and provided by you **at any time**. If the relevant requirements are met, you also have the following rights:

Right to rectification: You have the right to have incorrect personal data concerning you rectified.

Right to erasure: You can also request the erasure of your personal data, for example if your data is no longer required for the purposes for which it was collected or otherwise processed.

Right to restriction of processing: You also have the right to request the restriction of the processing of your personal data; in such a case, the data will be blocked for any processing. This right exists in particular if the accuracy of the personal data is disputed between you and us.

Right to data portability: If we process your personal data to fulfil a contract with you or on the basis of your consent, you also have the right to receive your personal data in a structured, commonly used and machine-readable format, if and to the extent that you have provided us with the data.

Right to withdraw consent: If you have given us your consent to process your personal data, you can withdraw this at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to object: In addition, you can object to data processing for reasons arising from your particular situation. However, this only applies in cases where we process data to fulfil a legitimate interest. If you can present such a reason and we cannot assert a compelling interest worthy of protection in further processing, we will not process this data for the respective purpose.

Objection to direct marketing: If your personal data is processed for direct marketing purposes, you may object to this processing at any time without giving reasons. Your data will then no longer be processed for this purpose.

6.2. If you would like to be provided with **information** about the personal data stored about you, wish to assert your other rights or have questions about data protection with us, you can contact us using the above-mentioned

contact details.

6.3. You also have the right to lodge **a complaint** with a supervisory authority **at any time**, in particular with a supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes data protection regulations.

The supervisory authority responsible for us is the

State Commissioner for Data Protection and
Freedom of Information North Rhine-Westphalia
Kavalleriestr. 2-4
40213 Düsseldorf
Phone: +49 (0) 211/38424-0
E-mail: poststelle@ldi.nrw.de

7. Status and amendment of this privacy policy

This privacy policy is valid as of 1 December 2026.
The further development of our company may also affect the handling of personal data. We reserve the right to amend this privacy policy if necessary. Changes will be published on our website and come into force upon publication.