

# Data Privacy Notice

This Privacy Notice explains how NNIT processes your personal data. Please see the NNIT website under "Data Privacy Policy" for further information.

## 1. Data Controller

The legal entities responsible (data controllers) for processing your personal data are the following companies in the NNIT Group:

<b>NNIT A/S</b>	<b>NNIT CZ s.r.o.</b>	<b>NNIT Switzerland AG</b>	<b>NNIT Germany GmbH</b>	<b>NNIT UK Limited</b>
CVR: 21 09 31 06 Østmarken 3A DK-2860 Søborg Denmark Phone: +45 7024 4242  Supervisory Authority: Datatilsynet <a href="http://www.datatilsynet.dk/">http://www.datatilsynet.dk/</a>	ID no.: 176 52 553 Bucharova 2641/14, Stodůlky 158 00 Prague 5 Phone: +420 277 020 401  Supervisory Authority: The Office for Personal Data Protection <a href="https://www.uoou.cz/">https://www.uoou.cz/</a>	ID no.: CHE-114.517.994 St. Alban-Vorstadt 94 CH4052 Basel Switzerland Phone: +41 44 405 9090  Supervisory Authority: Data Protection and Information Commissioner of Switzerland <a href="https://www.edoeb.admin.ch/edoeb/en/home.html">https://www.edoeb.admin.ch/edoeb/en/home.html</a>	ID no.: HRB 105107 Wiesenhüttenstrasse 11 60329 Frankfurt am Main Germany Phone: +49 69 66 36 98 73  Supervisory Authority: Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit <a href="http://www.bfdi.bund.de/">http://www.bfdi.bund.de/</a>	ID no.: 9399926 c/o TMF Group, 8 <sup>th</sup> floor 20 Farringdon Street London, EC4A 4AB UK  Supervisory Authority: The Information Commissioner's Office <a href="https://ico.org.uk/">https://ico.org.uk/</a>

<b>NNIT Inc.</b>	<b>NNIT (Tianjin) Technology Co., Ltd</b>	<b>NNIT Digital &amp; Life Sciences Philippines Inc.</b>	<b>NNIT Ireland Limited</b>	<b>NNIT Italia srl</b>
ID no.: 101019412 116 Village Boulevard Suite 200-61 Princeton, New Jersey 08540 USA Phone: +1 (609) 945 5650	ID no.: 9112010466611117XF 34/F, Luneng international Center East Road of Water Park, Nankai District Tianjin, China CN-300000 Tianjin Phone: +86 (22) 58856666	ID no.: 2022110075134 10/F, 2251 IT Hub 2251 Chino Roces Avenue Makati City 1233 Philippines Phone: +63 2 889 0999	ID no.: 572620 3013 Lake Drive, 2 <sup>nd</sup> floor Citywest Business Campus Dublin D24 PPT3 Ireland Phone: +353 1 4693722	ID no.: 6278000481 Via Pier Capponi, 69 50132 Firenze Italy Phone: +39 5661901956

## 2. Processing Activities

In NNIT we engage in the following processing activities as Data Controllers. Your personal data will only be accessible to NNIT employees with a work-related need to process the information or when NNIT uses authorized processors for processing of your personal data.

Purpose	Categories of Personal Data	Source	Legal Basis	Recipients	Rules for retention of data
Recruitment	Information related to recruitment, such as: <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Educational background</li> <li>CVs</li> <li>Salary information</li> </ul>	<ul style="list-style-type: none"> <li>The applicant (data subject itself)</li> <li>Third parties such as references and publicly available information</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(a) – consent to recruitment process</li> <li>GDPR Article 6(1)(b) – information necessary to enter into an employment contract</li> <li>GDPR Article 6(1)(f) – legitimate interests (recruitment).</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies</li> <li>Third party service providers (recruitment services and databases).</li> </ul>	6 months after completion of recruitment process or longer if consent is renewed by the data subject to be retained in recruitment systems.
Marketing and sales	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>E-mail</li> <li>Cookies</li> <li>Website statistics (NNIT websites)</li> <li>Job title</li> <li>Organisation</li> </ul>	<ul style="list-style-type: none"> <li>The data subject itself (recipients of marketing material)</li> <li>Data gathered by NNIT system (e.g., traffic on NNIT websites).</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(a) – consent for NNIT Group companies’ marketing purposes and cookies.</li> <li>GDPR article 6(1)(a) for third parties marketing purposes</li> <li>GDPR Article 6(1)(f) – legitimate interests for NNIT for optimization of website administrative and finalization of presentations</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies<sup>1</sup></li> <li>Cookies service provider</li> <li>Joint presenters for the purpose of targeting presentations to the participants</li> </ul>	<p>Contact information is held during a continued business relationship.</p> <ul style="list-style-type: none"> <li>Information collected for marketing purposes based on consent is deleted if consent is withdrawn and otherwise deleted after 6 months of inactivity, which applies to both leads and customers.</li> <li>Information collected from cookies are either automatically deleted after 14 days, if one or more cookies category are declined, or 12 months, if all cookies are accepted. Necessary cookies will</li> </ul>

<sup>1</sup> ~~NNIT A/S and affiliates listed as data controllers above as well as SCALES A/S, Excellis Health Solutions LLC, Excellis Europe Ltd, SL Control US and UK~~  
 Version 1.3      2023-25-04      Page 3 of 5

					automatically be added.
--	--	--	--	--	-------------------------

<b>Purpose</b>	<b>Categories of Personal Data</b>	<b>Source</b>	<b>Legal Basis</b>	<b>Recipients</b>	<b>Rules for retention of data</b>
Customer relations, contract and service management	<ul style="list-style-type: none"> <li>Names</li> <li>Addresses</li> <li>E-mail</li> </ul>	<ul style="list-style-type: none"> <li>The data subject itself (e.g., when receiving e-mails or letters)</li> <li>Data gathered/created by NNIT systems (e.g., mails)</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers and their representatives.</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies</li> <li>Third party data controllers (customers or business relations).</li> </ul>	Data is retained for the duration of a customer relationship. Data is deleted after the relationship has stopped and statutory limitations apply.
IT Service Management/Service Desk used for the provision of services to customers	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail</li> <li>UserIDs (such as initials)</li> <li>Issues or errors</li> </ul>	<ul style="list-style-type: none"> <li>Customers' systems (e.g., AD or employee databases).</li> <li>Customers' end-users (data subjects themselves).</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers and their representatives.</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies</li> <li>Third party data controllers (customers or business relations).</li> <li>Third party data controllers (customers)</li> <li>Third party service provider (Data Processors – such as ITSM and tool service providers).</li> </ul>	Data is retained for the duration of a customer relationship. Data is deleted after the relationship has stopped and statutory limitations apply.
IT administration	System administration such as: <ul style="list-style-type: none"> <li>Logs</li> <li>Audit trails</li> <li>AD (employee databases)</li> <li>Initials</li> <li>E-mails</li> </ul>	<ul style="list-style-type: none"> <li>NNIT systems</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(f) – NNIT's legitimate interests in ensuring logical IT security primarily as part of customer contracts</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies.</li> </ul>	Data is retained for the duration of a customer relationship. Data is deleted after the relationship has stopped and statutory limitations apply.

Physical security	<ul style="list-style-type: none"> <li>• Video surveillance recordings</li> <li>• Log entries at access points (doors)</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT systems</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(f) – legitimate interest in ensuring security in office premises.</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT Group companies.</li> </ul>	Data is deleted after 30 days as main rule.
	<ul style="list-style-type: none"> <li>• Head scans and/or fingerprints</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT Systems</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(a) and Article 9(2)(a) (consent).</li> </ul>		
Company split (transferring of customer personal data from NNIT to NewCo)	<ul style="list-style-type: none"> <li>• Personal data related to customer data contained in IT systems being transferred from NNIT to NewCo</li> </ul>	<ul style="list-style-type: none"> <li>• Customers' systems (e.g., AD or employee databases)</li> <li>• Customers' end-users (data subjects themselves).</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(f) – NNIT's legitimate interests to ensure appropriate transfer of personal data from NNIT to NewCo after closing day.</li> </ul>	<ul style="list-style-type: none"> <li>• NewCo</li> </ul>	The retention period will follow the individual processing activity as stated above.

### 3. Data transfers to countries outside the EU/EEA

NNIT will transfer your data to countries outside the EU/EEA. NNIT shares data internally with our affiliates China, the United States, Philippines, the United Kingdom, Switzerland, and Singapore. Data transfers will only be for specific purposes as specified in section 2, and NNIT will always make sure that there are adequate guarantees and safeguards for transfers outside the EU/EEA:

China Philippines Singapore United States	Standard Contractual Clauses
Switzerland The United Kingdom	EU Commission’s Adequacy Decisions: Switzerland United Kingdom

## 4. Your right

As Data Subjects you have certain rights. These are described in further detail in our Data Privacy Policy (available at the NNIT website under "Data Privacy").

You can exercise your rights by contacting the NNIT DPO (contact information is available at the NNIT website under "Data Privacy").