



DATA PRIVACY NOTICE

nnit.com



1. INTRODUCTION

At NNIT, we are committed to protecting your personal data and ensuring transparency about how it is collected, used, and shared. This Privacy Notice explains how we process your personal data when you interact with our website or services. It outlines your rights under GDPR, and how you can exercise them.

We value your trust and prioritize the confidentiality and security of your personal data. If you have any questions or concerns about this notice or how your data is handled, you are welcome to contact NNIT Global DPO using the information in section 9.

2. DATA CONTROLLERS

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

NNIT A/S	Scales A/S	NNIT Schweiz AG	NNIT Germany GmbH
CVR nr.: 21093106 Weidekampsgade 14 DK-2300 Copenhagen S Denmark Phone: +45 7024 4242 Supervisory Authority: Datatilsynet www.datatilsynet.dk	CVR nr.: 33957335 Automatikvej 1 2860 Søborg Denmark Supervisory Authority: Datatilsynet www.datatilsynet.dk	No.: CHE-114.517.994 Grosspeter Tower, Grosspeteranlage 29, 4052 Basel Switzerland Phone: +41 44 405 9090 Supervisory Authority: Data Protection and Information Commissioner of Switzerland www.edoeb.admin.ch/edoeb/en/home.html	ID no.: HRB 105107 Wiesenhüttenstr. 11 D-60329 Frankfurt am Main Deutschland Phone: +49 69 66 36 98 73 Supervisory Authority: Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit www.bfdi.bund.de

NNIT Czech s.r.o	NNIT UK Limited	NNIT Italy S.r.l.	NNIT Ireland Limited
ID no.: 176 52 553 Za Ženskými domovy 3379/1 Smíchov 150 00 Prague 5 Czech Republic Phone: +420 277 020 401 Supervisory Authority: The Office for Personal Data Protection www.uoou.cz/	Reg. number 9399926 C/O TMF Group, 13th Floor, One Angel Court, London, EC2R 7HJ United Kingdom Supervisory Authority: The Information Commissioner's Office www.ico.org.uk/	ID no.: 6278000481 Via Pier Capponi, 69 50132 Firenze Italy Supervisory Authority: The Italian Data Protection Authority (Garante per la protezione dei dati personali) www.garanteprivacy.it/web/guest/home	ID no.: 357104 Advancing Innovation in Manufacturing Centre, Market Place, Abbeyquarter North, Sligo F91 WV7R Supervisory Authority: Data Protection Commission of Ireland www.dataprotection.ie/en

NNIT España Consultoría Global y Tecnológica para Empresas, S.L.	NNIT Poland sp. zo.o	NNIT, Inc.	NNIT Digital & Life Sciences Philippines Inc.
ID no: B42753806 Doctor Fleming, 24 28036 Madrid, España Supervisory Authority: Agencia Española de Protección de Datos www.aepd.es/en	NIP: 6772410327 TMF Group Poland Rondo Ignacego Daszynskiego 2b 00-843 Warszawa Poland Supervisory Authority: Urząd Ochrony Danych Osobowych www.uodo.gov.pl/en	ID no.: 101019412 4 E Bridge Street New Hope, PA 18938 USA	ID no.: 2022110075134- 13 10/F, 2251 IT Hub 2251 Chino Roces Avenue Makati City 1233 Philippines

NNIT (Tianjin) Technology Co, Ltd.
34th Floor, Luneng International Center East of Water Park Road Nankai District, Tianjin

1. CATEGORIES OF PERSONAL DATA, PURPOSES OF PROCESSING, LEGAL BASIS AND RETENTION

NNIT collects and processes personal data for the below mentioned purposes, legal basis and retention periods.

Purpose	Categories of Personal Data	Legal Basis	Retention Period
Website Analytics	Cookies, IP address, browsing behavior, and website statistics (NNIT websites)	Necessary cookies are placed based on our legitimate interest in securing and operating the website under Article 5(3) of the ePrivacy Directive. Non-essential cookies are placed based on your consent under Article 5(3) of the ePrivacy Directive. Personal data collected via non-necessary cookies is processed under Article 6(1)(f) of the GDPR	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 automatically be added
Marketing Communication and events	Name, address, email, job title, organization, communication content, and event participation records	- GDPR Article 6(1)(a) – Consent for receiving marketing communications and event invitations, - GDPR article 6(1)(a) for third parties marketing purposes - GDPR Article 6(1)(f) - legitimate interests for NNIT for optimization of website administrative and finalization of presentations, including event administration	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
Customer and supplier relations, contract and service management, including potential customer and suppliers	Name, email, (work) address, and job title	- GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers, suppliers and their representatives - GDPR Article 6(1)(b) – information necessary to enter into a contract and pre-contractual considerations	Data is retained for the duration of a customer/supplier and/or contractual relationship. Data is deleted after the relationship has stopped and statutory limitations apply

NNIT FREELANCE consultants	Name, address, e-mail address, job title, educational background and CVs.	GDPR Article 6(1)(f) – legitimate interest of NNIT to assess freelance consultants for relevant tasks or projects.	24 months after registration in the NNIT FREELANCE platform. If data subject consents to retention of the data in the NNIT FREELANCE platform after the 24 months period, the data will be retained for an additional 24-month period.
Whistleblower reports (receiving, handling and following up on reports, conducting necessary investigations, and operational documentation	Name, contact details, and any personal data included in a report, potentially including special category data such as health data and data relating to criminal offences	GDPR Art. 6(1)(c) – legal obligation - GDPR Art. 6(1)(f) – legitimate interests - GDPR Art. 9(2)(f) – special categories in the context of legal claims	Reports are retained within applicable statutory limitations.
IT Service Management/ Service Desk used for the provision of services to customers	Name, Email, UserIDs (such as initials) and issues or errors	GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers and their representatives	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: logs, audit trails, AD (employee databases), initials and emails	GDPR Article 6(1)(f) – NNIT's legitimate interests in ensuring logical IT security primarily as part of customer contracts	Data is retained for the duration of a customer relationship. Data is deleted after the relationship has stopped and statutory limitations apply
Recruitment	Name, Address, E-mail, educational background, CV's, salary information of applicants	- GDPR Article 6(1)(a) – consent to recruitment process/retained CV. - GDPR Article 6(1)(b) – information necessary to enter into an employment contract or accepting user terms on profile platform - GDPR Article 6(1)(f) – legitimate interests (recruitment)	6 months after completion of recruitment process or longer if consent is renewed by the data subject to be retained in recruitment systems
Physical security	Video surveillance recordings, log entries at access points (doors)	GDPR Article 6(1)(f) – legitimate interest in ensuring security in office premises	Data is deleted after 30 days as main rule

2. SOURCES OF PERSONAL DATA

NNIT collects personal data for various purposes. In the following it is outlined where the data originates, to ensure transparency:

- **Website Analytics:** Data gathered by NNIT system (e.g., traffic on NNIT websites)
- **Marketing and Communication:** The data subject itself (recipients of marketing material)
- **Customer and supplier relations, contracts, including pre-contractual relationships and service management:** The data subject itself (e.g., when receiving e-mails or letters), data gathered/created by NNIT systems (e.g. mails), and the contracts
- **NNIT FREELANCE platform:** The data is collected when the data subject submits the information in the platform.
- **IT Service Management/Service Desk used for the provision of services to customers:** Customers' systems (e.g., AD or employee databases) and customers' end-users (data subjects themselves)
- **IT administration:** The data is collected through NNIT systems
- **Recruitment:** The applicant directly provides information such as name, address, CVs, and educational background. References and publicly available sources may also provide additional information
- **Physical security:** The data is collected through NNIT systems

3. DATASHARING

At NNIT we only share your personal data, when necessary to achieve the purposes outlined in the privacy notice or when required by law. Data sharing is conducted securely and in compliance with the GDPR and other applicable regulations.

Your personal data may be shared in the following ways:

- **Internal sharing:** Your personal data may be shared within the NNIT Group to ensure efficient operations, such as supporting customer relationships, maintaining IT systems, and managing recruitment processes. Only employees or departments with a legitimate need to access your data will have access
- **External sharing:** NNIT may share your personal data with trusted third parties including:
 - Service providers assisting with website analytics, marketing, and communication
 - Recruitment agencies and platforms involved in managing applications and hiring processes
 - Customers upon interest in external freelance consultant competencies
 - IT infrastructure and security providers supporting system maintenance and cybersecurity
 - Security service providers responsible for safeguarding NNIT's premises and assets

4. DATA TRANSFERS OUTSIDE EU/EEA

In some cases, your personal data may be transferred to countries outside the EU/EEA. NNIT may share data internally with our affiliate in the United States, Philippines, the United Kingdom, Switzerland, and Singapore. Data transfers will only be for specific purposes as specified in section 3 if necessary, and NNIT will always make sure that there are adequate guarantees and safeguards for transfers outside the EU/EEA.

For the countries outside the EU/EEA that have not been assessed by the EU Commission to have an adequate level of protection of personal data in the national legislation of the said countries, NNIT will ensure the adequate level of security typically by using the standard contractual clauses adopted by the EU Commission. You can request further information about such specific agreements by contacting privacy@nnit.com.

5. YOUR RIGHTS

Under GDPR, you have the following rights:

- **Access to your personal data:** You have the right to request access to the personal data we hold about you and certain related information.
- **Rectification of your personal data:** You can ask for us to correct any inaccurate or incomplete data
- **Deletion of personal data:** You have the right to request deletion of your personal data under certain legal conditions
- **Restrict or object to processing:** You have the right to restrict or object to the processing of your personal data.
- **Data portability:** You can request that your personal data should be transferred to another service provider in a commonly used, machine-readable format.
- **Right to withdraw consent:** You can withdraw your consent to data processing at any time, if consent is the legal basis for processing.

There may be conditions for use of or limitations on the above-mentioned rights.

If you have any questions about NNIT's processing of your personal data, please feel free to contact NNIT Global DPO using the contact details below.

6. AUTOMATED DECISION MAKING

NNIT does not use automated decision-making processes, including profiling, that could produce legal effects or similarly significant impacts on you as an individual. However, some automated systems may be used to enhance the functionality of our website or services, such as:

- **Website analytics:** Automated tools may analyze browsing patterns to optimize user experience and website performance
- **Cookie preferences:** Automated systems handle cookie management based on your consent and preferences

These systems are designed to support our services and do not make decisions that affect you without human involvement. If this approach changes, we will update this notice and provide you with the necessary information in line with applicable data protection laws.

7. DPO CONTACT AND HOW TO MAKE A COMPLAINT

For questions about data protection, contact our Data Protection Officer at Privacy@nnit.com

You have the right to complaint to the local authority of your country by using the contact details for each Supervisory Authority in section 2.

About NNIT

NNIT is a leading provider of IT solutions to life sciences internationally, and to the public and enterprise sectors in Denmark. We focus on high complexity industries and thrive in environments where regulatory demands and complexity are high.

NNIT consists of the group company NNIT A/S and its subsidiaries, including SCALES. Together, these companies employ more than 1,500 people across Europe, Asia and USA.

