

# 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 Czech Republic, s.r.o.</b>	<b>NNIT Schweiz 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	ID no.: 031 37 236 Explora Jupiter Bucharova 2641/14 2.NP CZ-158 00 Prague 5 Czech Republic Phone: +420 277 020 401	Bändliweg 20 CH-8048 Zurich Switzerland Phone: +41 44 405 9090	c/o Regus Herriotstraße 1, 60528 Frankfurt am Mai Germany Phone: +49 69 66 36 98 73	c/o MOFO Notices Limited Citypoint One Ropemaker Street London, EC2Y 9AW UK

<b>NNIT Inc.</b>	<b>NNIT (Tianjin) Technology Co., Ltd</b>	<b>NNIT Philippines Inc.</b>
4 Research Way Third Floor Princeton, New Jersey 08540 USA Phone: +1 (609) 945 5650	20th floor, Building A, Jin Wan Mansion Nanjing Road 358 CN-300100 Tianjin Phone: +86 (22) 58856666  诺和诺德（天津）科技有限公司 南开区南京路358号今晚大厦A座20层 300100, 天津, 中国 传真：86 22 27500121	10/F, 2251 IT Hub 2251 Chino Roces Avenue Makati City 1233 Philippines Phone: +63 2 889 0999

## 2. Processing Activities

In NNIT we engage in the following processing activities as Data Controllers.

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>	NNIT Group companies Third party service providers (recruitment services and databases).	6 months after completion of recruitment process or longer if consent is renewed by the data subject to be retained in recruitment systems.
Employee management	Information related to management and administration of employees, such as: <ul style="list-style-type: none"> <li>Location,</li> <li>Education</li> <li>Employment terms</li> <li>Performance management</li> <li>Warnings</li> <li>Terminations</li> <li>Resignations</li> <li>Insurance information</li> <li>Working hours</li> <li>Information on relatives ("emergency contacts")</li> <li>Work injury information.</li> </ul>	<ul style="list-style-type: none"> <li>The employee (the data subject)</li> <li>Information gathered in the course of NNIT systems and business processes and activities</li> <li>The employee (for data about employee relatives).</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(b) – information necessary to fulfill and employment contract</li> <li>GDPR Article 6(1)(f) – NNIT's legitimate interests in general employment management.</li> </ul>	NNIT Group companies	Term of employment. Data about former employees is generally deleted after statutory limitation in employment matters.
Employee administration	<ul style="list-style-type: none"> <li>Salary information,</li> <li>Pension information,</li> <li>Bonus</li> </ul>	<ul style="list-style-type: none"> <li>The employee (the data subject)</li> <li>Information gathered</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(b) – information necessary to fulfill and</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies</li> <li>Third party Service providers (such as</li> </ul>	Term of employment. Data about former employees is generally

Purpose	Categories of Personal Data	Source	Legal Basis	Recipients	Rules for retention of data
	<ul style="list-style-type: none"> <li>• Bank accounts</li> <li>• Company credit card information</li> </ul>	in the course of NNIT systems and business processes and activities	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(c) – NNIT is legally required to process the information (e.g. tax information)</li> <li>• GDPR Article 6(1)(f) – NNIT's legitimate interests in general employment management.</li> </ul>	<ul style="list-style-type: none"> <li>• salary services companies).</li> <li>• Third party Data Controllers, such as tax authorities, pension companies.</li> </ul>	deleted after statutory limitation in employment matters.
	Health data, such as: <ul style="list-style-type: none"> <li>• Handicap</li> <li>• Medical diagnosis</li> </ul>	<ul style="list-style-type: none"> <li>• The employee (the data subject)</li> <li>• Information gathered in the course of NNIT systems and business processes and activities</li> <li>• Public authorities</li> <li>• Health care professionals (medical records)</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR Article 9(2)(b) – necessary for NNIT to fulfill and exercise its rights under employment legislation, such as reimbursement for medical leave of absence.</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT Group companies</li> <li>• Public authorities</li> </ul>	Term of employment. Data about former employees is generally deleted after statutory limitation in employment matters.
Accounting (administration, accounts payables and receivables)	<ul style="list-style-type: none"> <li>• Invoice details</li> <li>• Name</li> <li>• Addresses</li> <li>• Credit card and expense receipts</li> <li>• Accounting and bookkeeping information</li> </ul>	<ul style="list-style-type: none"> <li>• The data subject itself (employees or invoice contacts)</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(c) – NNIT is legally required to process financial records, e.g. according to bookkeeping legislation.</li> <li>• GDPR Article 6(1)(f) – NNIT's legitimate interests in general for company and accounts management-</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT Group companies</li> <li>• Third party service providers (budget tools)</li> <li>• Third party controllers (such financial audit companies).</li> </ul>	Data is retained in accordance with applicable financial legislation requirement, such as bookkeeping legislation.
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> </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 marketing purposes and cookies.</li> <li>• GDPR Article 6(1)(f) – legitimate interests for NNIT for optimization of website.</li> </ul>	<ul style="list-style-type: none"> <li>• NNIT Group companies.</li> </ul>	Contact information is held during a continued business relationship.

Purpose	Categories of Personal Data	Source	Legal Basis	Recipients	Rules for retention of data
Corporate management and governance (shareholders and insider registries)	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Identification numbers (e.g. CPR-numbers and social security numbers)</li> <li>Passport information</li> </ul>	<ul style="list-style-type: none"> <li>The data subject itself.</li> <li>Data gathered by NNIT systems.</li> </ul>	<ul style="list-style-type: none"> <li>GDPR Article 6(2)(c) – NNIT is legally required to gather specific types of information about shareholders and insiders.</li> <li>GDPR Article 86 and the Danish Data Protection Act ("Databeskyttelsesloven") § 11.</li> </ul>	<ul style="list-style-type: none"> <li>NNIT Group companies</li> </ul>	Data is held for the duration of the relationship between the data subject and NNIT. Deleted according to statutory requirements.
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.
Physical security	<ul style="list-style-type: none"> <li>Video surveillance recordings</li> <li>Log entries at access points (doors)</li> </ul>	NNIT systems	<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>	NNIT Systems	<ul style="list-style-type: none"> <li>GDPR Article 9(2)(a) (consent).</li> </ul>		
IT administration	System administration such as: <ul style="list-style-type: none"> <li>Logs</li> </ul>	NNIT Systems	<ul style="list-style-type: none"> <li>GDPR Article 6(1)(f) – NNIT's legitimate interests in ensuring logical IT security</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

Purpose	Categories of Personal Data	Source	Legal Basis	Recipients	Rules for retention of data
	<ul style="list-style-type: none"> <li>• Audit trails</li> <li>• AD (employee databases)</li> <li>• Initials</li> <li>• E-mails</li> </ul>		primarily as part of customer contracts.		relationship has stopped and statutory limitations apply.

### 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 in China, The Philippines and Thailand. 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:

- The countries outside the EU/EEA have been assessed by EU Commission to not have an adequate level of protection of personal data in the national legislation of the said countries; NNIT will therefore ensure the adequate level of security 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](mailto:privacy@nnit.com).

### 4. Your rights

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").