# NNIT

## **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	CVR nr.: 33957335	No.: CHE-114.517.994	ID no.: HRB 105107
Weidekampsgade 14	Automatikvej 1	Grosspeter Tower,	Wiesenhüttenstr. 11
DK-2300 Copenhagen S	2860 Søborg	Grosspeteranlage 29,	D-60329 Frankfurt am
Denmark	Denmark	4052 Basel	Main
Phone: +45 7024 4242		Switzerland	Deutschland
	Supervisory Authority:	Phone: +41 44 405 9090	Phone: +49 69 66 36 98
Supervisory Authority:	Datatilsynet		73
Datatilsynet	www.datatilsynet.dk	Supervisory Authority:	
www.datatilsynet.dk		Data Protection and	Supervisory Authority:
		Information Commissioner of	Die Bundesbeauftragte
		Switzerland	für den Datenschutz
		www.edoeb.admin.ch/edoeb/en	und die
		<u>/home.html</u>	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	Reg. number 9399926	ID no.: 6278000481 Via Pier	ID no.: 572620 22
Ženskými domovy 3379/1	C/O TMF Group,	Capponi, 69	Advancing Innovation in
Smíchov 150 00 Prague 5	13th Floor, One Angel	50132 Firenze	Manufacturing Centre,
Czech Republic	Court,	Italy	Market Place,
Phone: +420 277 020	London, EC2R 7HJ	Supervisory Authority:	Abbeyquarter North,
401	United Kingdom	The Italian Data Protection	Sligo
Supervisory Authority:		Authority (Garante per la	F91 WV7R
The Office for Personal	Supervisory Authority:	protezione dei dati personali)	Supervisory Authority:
Data Protection	The Information	www.garanteprivacy.it/web/ga	Data Protection
www.uoou.cz/	Commissioner's Office	rante-privacy-en	Commission of Ireland
	<u>www.ico.org.uk/</u>		www.dataprotection.ie/e
			<u>n</u>

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

NNIT Singapore Pte. Ltd.	NNIT (Tianjin) Technology Co,	
	Ltd.	
18 Cross Street, Cross	34th Floor, Luneng	
Street Exchange 02-101	International Center	
or officially registered	East of Water Park Road	
address	Nankai District, Tianjin	
Singapore 048423		

### 3. 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)	<ul> <li>GDPR Article 6(1)(a) – Consent via cookie banner</li> </ul>	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 and Communication	Name, address, email, job title, organization and communication content	<ul> <li>GDPR Article 6(1)(a) – Consent for receiving marketing communi- cations,</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>	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 relations, con- tract and service mana- gement	Name, email and address	<ul> <li>GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers and their representatives</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	Name, Email, UserlDs (such as initials) and issues or errors	<ul> <li>GDPR Article 6(1)(f) – legitimate interest of NNIT in general contact with our customers and their representatives</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 administra- tion	System administration such as: logs, audit trails, AD (employee databases), initials and emails	<ul> <li>GDPR Article 6(1)(f) – NNIT's legitimate inte- rests in ensuring logical IT security primarily as part of customer contracts</li> </ul>	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, Salery information	<ul> <li>GDPR Article 6(1)(a) – consent to recruitment process</li> </ul>	6 months after completion of recruitment process or longer if consent is renewed by the data

		<ul> <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>	subject to be retained in recruitment systems
Physical security	Video surveillance recordings, log entries at access points (doors)	GDPR Article 6(1)(f) – le-gitimate interest in ensu-ring security in office premises	Data is deleted after 30 days as main rule
	Head scans and/or fingerprints	GDPR Article 6(1)(a) and Article 9(2)(a) (consent)	

#### **4. 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 relations, contract and service management: The data subject itself (e.g., when receiving e-mails or letters), data gathered/created by NNIT systems (e.g. mails)
- 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

#### **5. 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:
  - o Service providers assisting with website analytics, marketing, and communication
  - Recruitment agencies and platforms involved in managing applications and hiring processes

- o IT infrastructure and security providers supporting system maintenance and cybersecurity
- o Security service providers responsible for safeguarding NNIT's premises and assets

#### 6. 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 <u>privacy@nnit.com</u>.

#### **7. 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.

#### 8. 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.

#### 9. 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 1,700 people across Europe, Asia and USA.