

Data Protection Policy

1. Introduction

Noventiq (its subsidiaries, including each Noventiq operating company - together, “**Noventiq**”) is committed to ensure the protection of Personal Data of its Customers, Employees, Business Partners and any other individual.

The Data Protection Policy (hereinafter, the “**Policy**”) shows how Noventiq process the personal data of clients, suppliers, employees and other categories of natural persons, namely describe the principles applicable to the personal data processing within Noventiq.

Noventiq’s mission and objective is to observe privacy/data protection legal obligations and highest standards in all data processing instances, throughout the entire personal data life cycle.

The Policy is the document that provides a high-level guidance on Noventiq’s actions relating to personal privacy and data protection and it is the statement of the management of Noventiq of the standards that need to be met.

2. Scope

Noventiq processes personal data from several general purposes, which are listed in the record of personal data processing activities, under the form of a registry. This Policy applies to any Personal Data Processing that is done for or by Noventiq.

This Policy shall be complied with by all employees, contractors, consultants, including all personnel affiliated with third parties who may have access to any Noventiq resources.

3. Terms and Definitions

Personal Data	Any information regarding an identified or identifiable natural person
Data Subject	The natural person identified or identifiable through the personal data processing. An identifiable natural person is a person who can be identified, directly or indirectly, especially through referral to an identification element, such as a name, an identification number, localization data, an online identifier or one or more specific elements, characteristic to their physical, physiological, genetic, psychic, economic, cultural or social identity
Processing	Any operation or set of operations performed on personal data or personal data sets, with or without the use of automatic means,

	such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, usage, disclosure through transmittal, dissemination or making available through any other means, alignment or combination, restriction, erasure or destruction
Recipient	The natural person or legal entity, public authority, agency or other organism to which (whom) the personal data is disclosed, regardless if it is a third party or not
Personal Data Protection Officer/Responsible	The person in Noventiq responsible for meeting the demands regarding personal data protection, whether they were appointed Personal Data Protection Officer in the sense of the Regulation or was only assigned certain tasks in this sense, if there is not a Personal Data Protection Officer
Record of processing activities" or Personal Data Registry	Registry created by Noventiq according, in order to keep the record of the processing activities performed by Noventiq
Processor/data importer	Company or person mandated by the controller/operator" means the natural person or legal entity, public authority, agency or other organism that processes personal data on behalf of the controller/operator
Controller/operator	The natural person or legal entity, public authority, agency or other organism which, alone or together with others, establishes the purposes and means of the personal data processing
Third party	A natural person or legal entity, public authority, agency or organism, other than the data subject, the operator, the assignee and the people who, under the direct authority of the person mandated by the controller/operator, are authorized to process personal data
Noventiq group	All Noventiq operating companies partially or wholly owned unless specifically excluded
LATAM	Latin America
MENA	Middle East and North Africa
APAC	Asia Pacific region
CIS	Commonwealth of Independent States

4. Application of the law

The present Policy presents the principles applicable to personal data processing, which must be observed within Noventiq, without replacing the legislation on data protection applicable in all countries where Noventiq is established or does business in. The legislation prevails over this Policy, if it contains divergent provisions or additional

conditions. In particular, any conditions regarding reporting and authorization existing in the legislation concerning data processing based in the national legislation must be observed.

5. Principles of data processing

Each personal data processing must observe the rights and freedoms of the data subject, in accordance with the principles stated below. These must be observed even when new data processing is initiated or when the existing ones are extended or diversified.

Personal data processing is fair and lawful, meaning Noventiq has a **legitimate business purpose** (and, where required, a legal basis) for processing personal data. Where Noventiq acts as a processor, it will generally rely on the controller to establish this legal basis.

Personal data processing is limited to the **minimum necessary**, meaning Noventiq collects and retains the minimum amount of personal data necessary for the business purpose. Where Noventiq acts as a processor, it must also process personal data only as directed by the controller.

Noventiq is **transparent** with data subjects how and why their personal data will be processed. Where Noventiq is a processor, this information is likely to be provided to the data subjects by the controller.

Personal data is processed in accordance with the **rights of data subjects** (e.g. to access, erase or correct personal data). Where Noventiq acts as a controller, it must respect and observe any exercise of these rights, and where it is a processor it will be required to assist the controller in responding.

Personal data is **accurate, up-to-date** and **complete**. Where it acts as processor, Noventiq will assist the controller to ensure this.

Personal data is kept **secure**, meaning Noventiq applies appropriate security safeguards to personal data, including where processed by third parties. Where Noventiq acts as a processor, it will be required to implement its own appropriate safeguards and provide assistance to the controller in doing the same.

Personal data is **transferred internationally** in accordance with applicable law

Noventiq is **accountable and can demonstrate compliance** with its obligations under applicable data privacy laws

6. Rights of the data subject

Together with the principles mentioned above, Noventiq keeps in mind and observes the rights of the data subject in all personal data processing according with the applicable law, which might include:

- Right to information and transparency - Noventiq ensures that the data subject is informed with regard to the personal data processing;

- Right to access - Noventiq observes the procedure in order to ensure the access of data subjects to information regarding their data processing.
- Right to rectification - Regardless of the grounds for the processing, the data subjects have the right to request Noventiq to rectify or complete their data, as the case may be, on the basis of an additional statement.
- Right to restrict the processing - The data subjects can request Noventiq to restrict the processing of the personal data concerning them.
- Right to erasure („right to be forgotten”) - The data subjects have the right to request and obtain the erasure of personal data in some cases;
- Right to data portability – The data subjects have the right to request Noventiq to provide a copy of their personal data to the data subject or a Third Party in some cases.
- Right to oppose the processing/ Right to oppose the processing in direct marketing purposes: Noventiq shall not make decisions about data subjects based solely on automated processing.

7. Disclosure of personal data. Assignees. Transfer to Third-Party Countries

7.1 Type and purposes of personal data disclosures

Personal data shall only be disclosed if the party that receives it is personally liable for the data it has received or only if the party that receives them will use it in accordance with the instructions obtained from the party that discloses it.

Personal data can shall be disclosed for allowed purposes, mentioned in Noventiq’s records, in view of the performance of Noventiq’s activity, for observing legal obligations or if there is consent from the data subject.

7.2 Processors/Data importers

In situations in which the processing will be performed by another natural person or legal entity in the name of Noventiq, they will be an processor/data importer in the sense of the applicable law and must offer enough guarantees for the application of adequate technical and organizational measures for personal data protection, which it will process in the name of Noventiq and by observing the rights of the data subjects.

7.3 Transfer of data to a third-party country

There is a transfer to another country when the personal data is transmitted, visualized or accessed by persons who are in another country.

If the personal data collected and stored by Noventiq is transferred to a person situated in a different country than the one where Noventiq has its registered office, the person who received the data must guarantee a personal data protection level equivalent to the level ensured by Noventiq.

8. Contact points

Subject	Email	Address
For inquiries on this Policy contact our Global DPO	Dpo@soflina.com	London 26-28 Hammersmith Grove, London W6 7HA, UK
For personal information collected from individuals INSIDE Europe and MENA, written inquiries to the data protection responsible may be addressed to	Dataprotection.emena@Noventiq.com	London 26-28 Hammersmith Grove, London W6 7HA, UK
For personal information collected from individuals INSIDE LATAM, written inquiries to the data protection responsible may be addressed to:	Dataprotection.LATAM@Noventiq.com	Buenos Aires Maipú 939, Ciudad Autónoma de Buenos Aires, Argentina, C1006
For personal information collected from individuals INSIDE INDIA, written inquiries to the data protection responsible may be addressed to	Dataprotection.india@Noventiq.com	New Delhi (Gurugram) Unit No -515, 5th Floor, MGF Metropolis Mall, MG Road, Gurugram (Gurgaon), 122002, India
For personal information collected from individuals INSIDE APAC, written inquiries to the data protection responsible may be addressed to:	Dataprotection.APAC@Noventiq.com	Ho Chi Minh City Viet Dragon Tower, 7th Floor, 141 Nguyen Du Street, Ben Thanh Ward, District 1, Ho Chi Minh City, Vietnam
For personal information collected from individuals INSIDE CIS, written inquiries to the data protection	Dataprotection.CIS@Noventiq.com	Derbenevskaya emb. 7, Building 8, Business Quarters "Novospassky", Moscow, Russia, 115114

responsible may be addressed to		
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9. Compliance

The Global Data Protection Officer is owner of this Policy. Noventiq is committed to ensuring that this Policy is observed by all employees, contractors, consultants, including all personnel affiliated with third parties who may have access to any Noventiq resources.

Compliance with this Policy is verified by various means, including reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner(s). Noventiq monitors its compliance with this Policy on an ongoing basis. Any exceptions to this Policy require the written approval of the Global Data Protection Officer.

Failure to comply with this Policy, including attempts to circumvent it may result in disciplinary actions, including termination, as allowed by local laws.

Violations of regulations designed to protect Personal Data may result in administrative sanctions, penalties, claims for compensation or injunctive relief, and/or other civil or criminal prosecution and remedies.

10. Compliance

Noventiq may from time to time review and revise its Data Protection Policy (refer to section 12 for revision history)

11. Related documents

Document
Noventiq Data Protection Standard
Noventiq Data Subject Rights SOP
Noventiq Inventory & DPIA SOP
Noventiq Privacy Notice & Consent SOP
Noventiq Data Retention & Deletion Policy
Noventiq Breach Policy
Quality Management System Requirements (ISO 9001)

Information Technology Security Techniques (ISO 27001)
Noventiq Password Protection Policy
Noventiq Information Security Policy
Noventiq Anti-Virus Protection Policy
Noventiq Information Security Access Management Policy
Noventiq Scope of Information Security Management System
Noventiq Technical and Organisational Measures Ensuring Information Security of ISMS Units
Noventiq Physical Protection and Equipment Security Policy
Noventiq Corporate Ethics and Compliance Code
Noventiq Supplier Code of Conduct

12. Revision history

Issue No	Version No	Issue Date	Summary of Changes
1	1.0	2021	Final Document