

# **Data Privacy Notice**

This Privacy Notice explains how Aeven processes your personal data. Please see the Aeven 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 Aeven:

Aeven A/S	Aeven Czech Republic, s.r.o.	Aeven Philippines Inc.
CVR: 43 43 21 33	ID no.: 031 37 236	ID no.: NV2304793
Østmarken 3A	Explora Jupiter	10/F, 2251 IT Hub
DK-2860 Søborg	Bucharova 2641/14 2.NP	2251 Chino Roces Avenue
Denmark	CZ-158 00 Prague 5	Makati City 1233
Phone: TBA	Czech Republic	Philippines
Email:	Phone: +420 774 684 972	Phone: +63 2 889 0999
privacy@aevengroup.com		
	Supervisory Authority:	
	The Office for Personal Data	
Supervisory Authority:	Protection	
Datatilsynet	https://www.uoou.cz/	
http://www.datatilsynet.dk/		

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## 2. Processing Activities

In Aeven we engage in the following processing activities as Data Controllers. Your personal data will only be accessible to Aeven employees with a work-related need to process the information or when Aeven 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:  Name Address Educational background CVs Salary information	The applicant (data subject itself) Third parties such as references and publicly available information	GDPR Article 6(1)(a) — consent to recruitment process GDPR Article 6(1)(b) — information necessary to enter into an employment contract GDPR Article 6(1)(f) — legitimate interests (recruitment).	Aeven     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.
Marketing and sales	<ul> <li>Name</li> <li>Address</li> <li>E-mail</li> <li>Cookies</li> <li>Website statistics (Aeven websites)</li> <li>Job title</li> <li>Organization</li> </ul>	The data subject itself (recipients of marketing material) Data gathered by Aeven system (e.g., traffic on Aeven websites).	GDPR Article 6(1)(a) — consent for Aeven's marketing purposes and cookies. GDPR article 6(1)(a) for third parties marketing purposes GDPR Article 6(1)(f) — legitimate interests for Aeven optimization of website administrative and finalization of presentations	Aeven     Cookies service provider     Joint presenters for the purpose of targeting presentations to the participants	Contact information is held during a continued business relationship.  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.  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.

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Purpose	Categories of Personal Data	Source	Legal Basis	Recipients	Rules for retention of data
Customer relations, contract and service management	<ul><li>Names</li><li>Addresses</li><li>E-mail</li></ul>	The data subject itself (e.g., when receiving e-mails or letters)  Data gathered/created by Aeven systems (e.g., mails)	GDPR Article 6(1)(f) —     legitimate interest of Aeven     in general contact with our     customers and their     representatives.	Aeven     Third party data controllers     (customers or business     relations).	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 E-mail UserIDs (such as initials) Issues or errors	<ul> <li>Customers' systems (e.g., AD or employee databases).</li> <li>Customers' end- users (data subjects themselves).</li> </ul>	GDPR Article 6(1)(f) —     legitimate interest of Aeven     in general contact with our     customers and their     representatives.	Aeven     Third party data controllers (customers or business relations).     Third party data controllers (customers)     Third party service provider (Data Processors — such as ITSM and tool service providers.	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 E-mails	Aeven systems	GDPR Article 6(1)(f) —     Aeven's legitimate interests     in ensuring logical IT security     primarily as part of customer     contracts	Aeven	Data is retained for the duration of a customer relationship. Data is deleted after the
Physical security	Video surveillance recordings Log entries at access points (doors) Head scans and/or fingerprints	Aeven systems     Aeven Systems	<ul> <li>GDPR Article 6(1)(f) —         legitimate interest in         ensuring security in office         premises.</li> <li>GDPR Article 6(1)(a) and         Article 9(2)(a) (consent).</li> </ul>	Aeven	Data is deleted after 30 days as main rule.

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

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

Philippines	Standard Contractual Clauses

## 4. Your right

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

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

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