

Privacy Notice

1. Contact information for privacy matters

If you have any questions regarding your personal data, feel free to contact our Data Privacy Team via privacy@netminds.dk.

2. Sources of your personal data

Netminds may collect and process information that

- you personally provided to us in hard copies, sent by email or through messengers to our representatives
- we generate internally during the performance of a contract between you and Netminds
- you provide during interaction with our websites, through cookies and web forms
- we obtain from third parties, integrated services, or recruitment agencies
- we obtain from open sources, social media sources, or public websites

Netminds will not process your personal data if such is prohibited by applicable data protection laws or regulations.

3. Purposes of processing

Netminds processes your personal data linked to particular purposes and corresponding legal bases outlined below:

- purposes to which you agree in a consent form
- for the fulfillment of the contract as further specified in our contracts with Specialists, clients, and Externals
- in order to comply with legal obligations specified in a particular law or regulation
- legitimate interests pursued by Netminds, except where such interests are overridden by your interests or fundamental rights and freedoms

Please read the relevant section below for further information. Please consider that you may belong to more than one category.

In case Netminds is planning to change the purpose of processing to such that is incompatible with the original one, we will contact you to provide you with further information on purposes for processing prior to it taking place, at all times ensuring appropriate legal basis for processing, which may include asking for your additional consent.

Netminds does not process your personal data for automated decision-making, including profiling.

4. Recipients of personal data

Netminds Group consists of the following entities: Netminds ApS (Denmark), Netminds Poland Sp. z o.o. (Poland), Netminds Ukraine LLC (Ukraine).

All your personal data will be kept strictly confidential and will not be disclosed to unauthorized third parties or made public without your prior notification by this notice or in person. Netminds will not transfer your personal data internationally without reasonably ensuring that your rights and freedoms as the data subject are protected.

We never sell your data or share it with other third parties in order to obtain direct or indirect financial gains.

To obtain information about third-party recipients of your personal data, please read the relevant section below. Please consider that you may belong to more than one category. If you need further assistance, please contact our Data Privacy Team via privacy@netminds.dk.

5. Where Netminds stores your personal data

We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. We secure the personal data you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. All personal data is protected using appropriate physical, technical, and organizational measures. Netminds entities are certified with international standards ISO/IEC 27001:2022 and ISO/IEC 27701:2019 and regularly updated to comply with industry best practices.

Please mind that transmission of information via the Internet (including by email) is not completely secure, and, although Netminds will do its best to protect your personal data, we cannot guarantee the security of your data in transfer. Accordingly, please proceed with any such transmission at your own risk.

Netminds uses third-party service providers, some of which are located outside of the European Union. This means that we may transfer personal information to countries outside of the European Union. When we do, we ensure that an adequate level of protection is provided for the information by following the requirements of the European Commission, local data protection legislation and the GDPR in the countries where Netminds has offices:

- We may transfer personal information to countries that have privacy laws that have been recognized by the country from which the data are transferred as providing similar protections for the data ('adequacy decision')
- We may rely on other transfer mechanisms approved by authorities in the country from which the data are transferred
- We may seek your consent for transfers of your personal information for specific purposes

When we transfer your information outside of the European Union, we make sure that the service provider is maintaining appropriate security measures to protect your personal information.

6. Storage period

We store your personal data for a limited period of time, which varies depending on the type of data, the purposes of the processing, legal requirements, and the duration of the contractual relationship with Netminds.

To obtain information about the storage period of your personal data, please read the relevant section below. Please consider that you may belong to more than one category. If you need further assistance, please contact our Data Privacy Team via privacy@netminds.dk.

7. Your rights

As a data subject you have the following rights:

- right to obtain information in relation to your personal data
- right to access your personal data
- right to data portability
- right to withdraw the consent
- right to correct mistakes in your personal data
- right to stop the unwarranted processing
- right to be forgotten (erase your personal data)
- right to be aware of the existence of the automated individual decision-making and to object in this regard
- right to lodge a complaint to a supervisory authority

1. Specialists

1.1 Sources of your personal data

Netminds collects and processes the information originated as follows:

- Information that you personally provide, e.g., by filling in questionnaires or during the communication with HR department specialists, information entered into IT systems to which you have been granted access, provided on paper, or sent in corporate emails
- Information collected directly from you
- Information that you store at company-owned equipment provided to you
- Data provided by third parties, e.g., information collected and provided to us by third parties for the execution of a contract and maintenance of the contractual relationship between you and Netminds. This data may include feedback from clients that have experience of working with you, pre-employment screening results, or feedback from Netminds client representatives
- Data generated internally, e.g., your login in the systems, logs of performed actions in the internal systems and corporate network, CCTV footage, videos created during an interview with you, corporate structure data, collaboration history, data obtained from your team leads and other Netminds Specialists

1.2 Types of information

Netminds collects and processes the following types of information:

- For the purpose of maintenance of employment records during the onboarding and offboarding: name, surname, gender, citizenship, date of birth, registration address, residence address, tax ID, working location, division, department, project, position and grade, email, phone number, instant messenger, English level, T-shirt size, employment history, work experience, job family, CV, reference, screening results, evaluation (after an interview), link to social profiles, job satisfaction surveys, bank account number, contracts, and amendments to the contracts, start date, end of probation date, last working date, dates of next performance and salary review, links to IDP and knowledge evaluation, information about unavailability reasons (including health certificates if applicable), IDP with goals for career development, exit interview results, reasons for termination of the employment
- For the purpose of maintenance of records for individual contractors: name, surname, gender, citizenship, date of birth, registration address, residence address, tax ID, working location, division, department, project, position and grade, email, phone number, instant messenger, English level, T-shirt size, employment history, work experience, job family, CV, reference, screening results, evaluation (after an interview), link to social profiles, job satisfaction surveys, bank account number, contracts, and amendments to the contracts, start date, end of probation date, last working date, dates of next performance and salary review, links to IDP and knowledge evaluation, information about unavailability reasons (including health certificates if applicable), IDP with goals for career development, exit interview results, reasons for termination of the employment

- For the purpose of workplace administration: name, surname, position, email
- For the purpose of ensuring physical security within Netminds premises: name, surname, photo, email, signature, CCTV footage
- For the purpose of business trip management and related financial accounting: name, surname, date of birth, phone, email, department, budget holder name, budget holder surname, travel dates, destination, passport scan copy, passport issuing date, passport expiration date, passport number, citizenship, tax id scan copy, reservation details, travel documents, travel costs
- For the purpose of event organization, including holiday events for kids: name, surname, date of birth, gender, department, position, project, email, phone, location, photo, name and surname (of a child), date of birth (of a child), photo and video with participants of the events

Please review our corporate policies and procedures to obtain more information about personal data processing practices in Netminds.

1.3 Purposes of processing

Netminds processes data for the fulfillment of the contract or in order to comply with legal obligations specified in a particular law or regulation, which may vary in the countries where we operate. When personal data is processed based on a legitimate interest of Netminds as an employer, partner, or service provider we ensure that your interests as a data subject are not overridden by your interests or fundamental rights and freedoms. Data is processed for the following purposes:

- **Maintenance of employment records:** Official employment documents processing, team management, the establishment of contractual relationships, employment, the performance of a contract, and remuneration.
- **Maintenance of records for individual contractors:** Netminds Specialists' accounting and performance of contractual obligations, team management, and establishment of contractual relationships.
- **Workplace administration:** identifying workplace location, workspace administration, and maintenance, procurement of services/equipment with delivery to the office or individuals, user access management, and provision of physical access to premises.
- **Financial accounting and operations:** payments to Specialists for services, financial accounting, reimbursement, payment of taxes, bank account opening, financial reporting, obligatory payments.
- **Provision of access to information resources and hardware:** provision of access to information resources, software accounting, and hardware accounting.
- **Internal and external communication:** communications, promo actions, and marketing, event organization.
- **Performance of services:** software development, project delivery, management of the projects.
- **Business trip management:** business trip organization, business trip accountancy.
- **Support during relocation to different offices of Netminds and client sites:** relocation, obtaining a work permit and visa opening, support during immigration, monitoring of visas and initiation of work and residence permit extension, and related consulting.

- **Protection of Netminds information and its related assets:** information security monitoring and troubleshooting, business continuity management, infrastructure support.
- **Time tracking for employees:** collection, processing, and storage of information related to worked hours, vacations, days of absence, and sick leaves.
- **Education, knowledge, and performance management.**

1.4 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- client, to whom you are providing services too, for the performance of a contract
- external accounting service providers in your country, for the provision of accounting and payment services
- external tutors, knowledge management providers, or other service providers that assess your performance and may suggest you points for improvement
- external providers that provide services of transportation, accommodation, or other service providers that may support during a business trip
- external auditors
- service providers supplying and servicing our internal systems
- attorneys and legal councils
- banks and other financial service providers for transfer of remuneration for your services
- governmental entities where required by law or mandatory order
- third parties that issue visas and work permits, including embassies, immigration offices, etc., if you requested a relocation
- landlords and other providers of physical security services in our offices
- security operation centers and other service providers
- hosting providers
- telecommunication services providers

1.5 Retention period

Based on the type of processed personal data, it may be stored for a different period of time from 3 months (CCTV video records) up to a period of time that is required by applicable law. If you need more information, please, contact our Data Privacy Team via privacy@netminds.dk.

2. Candidates

2.1 Types of information

Netminds collects and processes any information that was provided by you directly to us or by the companies acting as recruitment agencies or your referees. Netminds processes your personal data including your name, surname, date of birth, gender, email, phone number, address, skype, links for social media profiles, work experience, technologies, education, location, feedback from interviewers and client representatives, etc. We do not collect sensitive personal data for recruitment purposes. Please note that in case you provide sensitive data voluntarily, for example

by including it in your CV, Netminds may store this personal data in files that you provided, which become attached to your profile in our internal systems, but will not process or use the data for other purposes than storage.

2.2 Purposes of processing

All personal data is collected and processed only for the following purposes:

- entering your information into Netminds internal systems in order to provide additional offers about open vacancies that may be interesting for you
- establishment of a contractual relationship between you and Netminds. Additional information may be requested from you by Netminds recruitment representatives in order to prepare the contract
- technical maintenance of our internal systems, including data backup, and data migration without any modification of your personal data

2.3 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- email service provider if the data is transferred to us via email
- our client representatives if they are participating in candidates' interviews and approval for open positions
- service providers supplying and servicing our internal systems for candidate relations management

2.4 Retention period

The retention period of your data may vary based on current legislative requirements. Netminds does not store your personal data for a period longer than 7 years from the last contact with you. If you would like to be erased from the Netminds candidates' database earlier, please contact our Data Privacy Team via privacy@netminds.dk.

3. Office visitors

3.1 Types of information

Netminds processes personal data like your contact details and full name, email, date and time of visit, signature, and video records created during your visit.

3.2 Purposes of processing

All personal data is collected and processed only for the following purposes:

- to ensure the physical and information security of the premises
- to protect your safety during the visit of the premises

- to provide you with other administrative services (taxi, catering services, etc.) to ensure that your visit to Netminds premises will be pleasant and convenient

3.3 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- email service providers if data is transferred via email
- business center owners and other administrative service providers (taxi service, catering service) which ensure that your visit to Netminds premises will be pleasant and convenient

3.4 Retention period

Based on the type of information your personal data may be stored in our internal systems for up to 3 years, however, video records created during your visit are stored for no longer than 3 months. If you would like to obtain more details, please contact our Data Privacy Team via privacy@netminds.dk.

4. Website visitors

4.1 Types of information

During visiting our website Netminds may collect information directly entered by you in contact us forms or through cookies, beacons, and other trackers. You can manage the collection of cookies and withdraw your consent at any time. If you consented to cookie collection Netminds may process your personal data which includes your IP, location, visited web pages on our website, and, if you filled out the “contact us form”, your email and information in the text of the message.

All personal data is collected and processed only for the following purposes:

- to ensure the stable operation of the Netminds website
- to recognize you when you return to our website
- to monitor the popularity of our publications and webpages
- to provide you with relevant and personalized information on our website
- to provide you with more information about the content you previously reviewed and adjust the website to your interests
- to send you information about our products and services
- to provide you with valuable and important information related to our products and services

4.2 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- our partners which may deliver relevant information to you through advertisements, publications, and other materials
- service providers supplying and servicing our website
- email service provider if the data is transferred to us via email or “contact us” form

4.3 Retention period

Information collected through cookies, beacons, and other trackers is retained for no longer than 6 months, however, based on collected information impersonalized and aggregated statistics can be created and processed. Please review the Cookie Policy for more information.

Information entered by you in the “contact us” form can be stored and retained for 12 months from the last contact date (please see the section for representatives of potential clients for additional information).

5. Event participants

5.1 Types of information

Netminds collects and processes the information provided by you directly to us or via intermediaries when registering or participating in an event. In this case, Netminds processes your personal data such as full name, contact details, photos and videos made during the event. If you leave your contacts to our representatives in order to hear more about Netminds jobs, we will also process information about your professional experience, technologies in which you are proficient, industry, and your current job position (please refer to “Candidates” for more information).

5.2 Purposes of processing

Depending on your role in the event, your personal data may be processed for one or several of the following purposes:

- to organize current public events and prepare materials that will suit your professional experience and may be relevant for your current job position or industry
- to share information about current public events on social media platforms and on other public websites
- to invite you to an event that might be interesting for you and might promote your technical skills or boost your company's performance
- to provide you with information about job positions/service offerings that may be interesting for you
- to publish information (photo and/or video that may contain your image) on external websites to invite participants to the event
- to publish information (photo and/or video that may contain your image) on the external Netminds websites

5.3 Recipients

Your personal data may be wholly or partially disclosed to third parties in the following cases:

- companies of the Netminds Group
- email service provider if the data is transferred to us via email
- providers of external services that are used for the collection of your personal data, in particular when registering for the event
- external speakers that will present during the event
- external web resources on which photos and videos from the events will be published

5.4 Retention period

Your personal data is stored no longer than 3 years from the date of the event. Please mind that you may be included in other categories described in this notice (including “Candidate” or “Office visitor”) category during the event and if so, please read the corresponding section of this notice.

6. Representatives of potential clients

6.1 Types of information

Netminds collects and processes information that is provided by you or other individuals on your behalf, as well as information available on public and open sources. In this case, Netminds processes personal data related to the company or business you represent, including your name, email, job position, LinkedIn profile, etc. We do not send marketing emails to personal emails unless explicit consent is provided.

6.2 Purposes of processing

All personal data is collected and processed only for the following purposes:

- to establish a contractual relationship between your company and Netminds
- to provide you with information about our services and products

6.3 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- email service provider if the data is transferred to us via email

6.4 Retention period

Personal data is retained for 12 months from the last contact unless contractual relationships are established.

6.5 Legal basis for processing

Netminds has a legitimate interest in processing personal data related to the company or business you may represent, in order to personalize the communication we deliver and ensure the success of our marketing campaigns in order to increase our revenue. Processing personal information helps us to create personalized and valuable content for you, which we provide free of charge. We consider that processing of such data is mutually beneficial and based on our assessment the processing will have a minimal negative impact on you.

Netminds does everything possible to make sure the measures are taken to process only business-related information and ensure the security of personal data processed. In addition to that, we are adjusting the content so that the communication you receive is directly related to your work, location, usage of our website, or job title.

We do not use personal data processed under a contract for the purposes of marketing and advertising without establishing that prior consent was obtained. You may always unsubscribe from communications you received from us. You have all rights in relation to your personal data as further described in the first section of this Notice. Netminds never sells your personal information or discloses it to third parties for other purposes than described in this section.

7. Representatives of current or former clients

7.1 Types of information

Netminds collects and processes information that is provided by you, other individuals from your company and/or entered into written contracts between your company and Netminds. In this case, Netminds processes personal data related to the company or business you represent like your name, email, company name and address, job position, phone number, social profile reference, emails sent from you to Netminds, etc.

7.2 Purposes of processing

All personal data is collected and processed only for the following purposes:

- to enter your information into internal information systems in order to contact you with information related to our service offerings
- to establish a contractual relationship between your company and Netminds
- to execute the contract with your company and to maintain a good relationship with your company and its representatives
- to prepare business cases and marketing materials mentioning your company representatives in order to promote the image of your company's and Netminds business (where permitted by contract)
- to invite your company's representatives to participate in the events organized and hosted by Netminds
- to inform about changes in the performance of the services and additional arrangements, if required
- to provide the information requested by your company or its representatives

7.3 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- email service provider if the data is transferred to us via email
- hosting providers

7.4 Retention period

Client and client representative personal data is stored for 3 years after the end of the contractual relationship with the Client. Contractual data may be stored by Netminds longer, if it is required by law.

If personal data belongs to an individual who is no longer represents a client, personal data may be deleted immediately (except email correspondence which may be used in order to execute the contract with the client) after the provision of information to consideration of the Netminds Data Privacy Team via privacy@netminds.dk.

8. Representatives of vendors and service providers

8.1 Types of information

Netminds collects and processes information that is provided by you, and other individuals from your company or is entered into written contracts between your company and Netminds. In this case, Netminds processes personal data like your name, email, company name and address, job position, phone number, social profile reference, etc.

8.2 Purposes of processing

All personal data is collected and processed only for the following purposes:

- to enter your information into internal information systems in order to contact you with information related to services that are provided by your company and/or you
- to establish a contractual relationship between your company and Netminds
- to execute the contract with your company and to maintain a good relationship with your company and its representatives
- to inform about changes in the performance of the services and additional arrangements, if required
- to provide the information requested by your company or its representatives

8.3 Recipients

Your personal data may be wholly or partially disclosed to the following third parties:

- companies of the Netminds Group
- email service provider if the data is transferred to us via email

- electronic signature service provider if the contract with you was signed in electronic format

8.4 Retention period

Personal data is retained during the performance of a contract with a vendor or service provider plus the amount of time that is defined by law in your country.

If personal data belongs to an individual who no longer represents a vendor or service provider, personal data may be deleted immediately after the provisioning of information to consideration of the Netminds Data Privacy Team via privacy@netminds.dk.