



Solutions for New Technologies

1. INTRODUCTION

Solutions 30 and each of its affiliates and subsidiaries (collectively "Solutions 30 Group" or "Solutions 30") have implemented this Data Privacy Policy ("Privacy Policy") in order to ensure that it is fully compliant with privacy requirements, laws and regulations applicable. The purpose of this policy is to outline the circumstances under which Solutions 30 collects, uses, and discloses Personal Data of Data Subjects and the safeguards that are in place to protect the privacy of Data Subjects.

This Privacy Policy focuses on the legal requirements established by the General Data Protection Regulation ("GDPR"). Where local data privacy law establishes greater protections for Personal Data, such local law applies. This policy supersedes all prior policies on the subject matter.

The protection of your Personal Data is of particular concern to us. We treat the data which you provide us within the scope of the utilization of our website: www.solutions30.com (the Website) and offer confidentiality in line with the applicable data protection laws. This Privacy Policy informs the users of the Website how Solutions 30 as controller, within the meaning of the GDPR, collects and processes the Personal Data and other information of such users in connection with their usage of the Website.

Note that for other websites of the companies belonging to Solutions 30 Group, other services or other relationships with users, suppliers or customers other privacy terms may apply. This Privacy Policy does not apply to third-party sites which may be linked to from this Website.

2. DEFINITIONS

- **2.1. Data Protection Officer** means a data privacy expert appointed by the respective companies belonging to Solutions 30 Group, who is accountable that the relevant company belonging to Solutions 30 Group is following policies and procedures set out to protect Personal Data.
- **2.2. Data Subject** means a natural person to which Personal Data relates.
- **2.3. Personal Data** means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (e.g., IP-address, cookie tag) or location data. The term Personal Data is very broad under the GDPR. To qualify as Personal Data it is not necessary to combine the name of a natural person with other identifiers of the natural person.
- 2.4. Processing means any use or operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organizing, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, transfer or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing can include asking a person for information, capturing information on call details (including call recording), logging and analyzing network traffic and accessing a customer's CRM system or other external database, if applicable.

3. Our Principles

When using our Website, we are committed to collect and process your Personal Data in compliance with the GDPR's principles. Therefore, we bound ourselves that Personal Data shall be:

• Lawfully, fairly and transparently processed;

- Processed only in the scope of the mentioned purposes;
- Processed in accordance with the data minimization principle;
- Accurate and up to date;
- Stored only during the period necessary for the purposes, and
- Secured and kept confidential.

<u>Legal basis:</u>

- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (e.g., affiliates or subsidiaries of Solutions 30), except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data (Art. 6(1)(f) GDPR). Such interests are to provide you with the Website as requested by you and to achieve the other purposes as set out above.
- Processing is necessary for the performance of a contract (e.g., the usage relationship) to which you are a party or in order to take steps at the request of you prior to entering into a contract (Art. 6(1)(a) GDPR).

4. TYPES OF PERSONAL DATA THAT ARE PROCESSED

4.1. Sources

We may process data about you from a variety of sources:

- Personal Data collected when you visit our Website;
- Personal Data collected when filing in the contact form on the Website;
- Personal Data collected from public sources when applying for a vacancy (e.g. Viadeo, Twitter, LinkedIn);
- Personal Data collected when applying for a vacancy (previous experiences, previous employers, etc.);
- Personal Data created by means of records of our interactions such as correspondence regarding job application, interviews, queries or complaints.

4.1.1. Website use

Types of Personal Data processed:

- details on your browser (e.g., type, version, language);
- operating system and interface;
- website from which you are visiting us (referrer URL);
- webpage(s) you are visiting on our Website;
- date and time of accessing our Website and time zone difference;
- access status/HTTP status code;
- · volume of data transferred, and
- Internet protocol (IP) address.

Purpose: The processed Personal Data will be used to provide you access to the Website and to maintain or restore the security of the Website, or to detect technical faults and/or errors in the transmission of electronic communications.

4.1.2. Our services on the Website

Types of Personal Data processed:

- Personal and contact details: title, full name, date of birth, age, gender, address, telephone numbers, email address, picture, copy of ID card or passport, social security number, language/dialect spoken, preferences, subscriptions and pastimes.
- Career history: business activities, work history, employment roles, experiences and referees, work telephone number, former and current names and contact details of employees, work-related social media profile details.
- Qualification, Training and Education History: schools and universities attended, qualifications obtained, additional training obtained.
- Interview details: interview responses, opinions of interviewers, the following correspondence.
- Any other information that you choose to communicate in the framework of your demand or application.

Purpose: Personal Data is processed in order to fulfil the following purposes:

- to provide you with the services requested;
- to deal with communications received from you, contacts via phone or email, and responding to your queries, complaints;
- to maintain and update our list of contacts and our job applicant database, and
- to support and progress your applications for employment with Solutions 30.

4.2. Use of your Personal Data

We may use your Personal Data in the following ways:

- to administer our Website and for internal operational purposes to make user experience more efficient (including troubleshooting) and to analyze how the systems are used;
- to assess your application and determine whether a certain position fits your profile;
- to contact you to arrange an interview, to discuss a particular contract or its execution.

5. WHAT HAPPENS IF YOU CHOOSE NOT TO PROVIDE YOUR PERSONAL DATA?

The provision of your Personal Data is generally not required by a statutory or contractual obligation. However, the provision of certain of your Personal Data is necessary to visit our Website, to enter into a contract with us or to receive our services/products or information as requested by you. In certain cases, the provision of your Personal Data is voluntary.

Not providing your Personal Data may result in disadvantages for you – for example, you may not be able to receive certain products and services or use the Website with all its functionalities. However, unless otherwise specified, not providing your Personal Data will not result in legal consequences for you.

6. SHARING YOUR PERSONAL INFORMATION WITH OTHERS

Depending on the nature and scope of our assignment or the services requested from us, we may share Personal Data with the following recipients to the extent that such disclosure or transmission is deemed reasonably necessary or desirable for satisfying the purposes mentioned above or at the specific legitimate request of our clients, the Data Subjects concerned:

- external entities such as advisers, service providers or other third parties related to our services;
- lawyers, authorized employees, agent or other persons acting on Solutions 30's behalf in case of a legal dispute, and
- third party service providers who assist us in organizing operational services and/or who deal with data subjects' complaints.

7. INTERNATIONAL DATA TRANSFERS

Depending on the nature and scope of our assignment or the services requested from us, we may transfer personal information abroad to the extent that such transmission is deemed reasonably necessary or desirable for satisfying the purposes mentioned above, including outside of the European Union/European Economic Area, in countries not recognized by the European Commission as having an adequate level of protection for personal information.

Personal Data may be sent to, accessed from, or stored in any country where:

- it is necessary or useful in the context of our services; or
- we have third party service providers.

We will take appropriate steps to ensure that transfers of Personal Data are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of protection or where we are satisfied that alternative arrangements are in place to protect your privacy rights.

Depending on the circumstances, transfers may be made:

- to another EU member state, hence offering an adequate level of data protection required by the GDPR;
- according to appropriate safeguards (i.e. the entry into standard data protection clauses adopted by the European Commission or by a supervisory authority (Art. 46(2)(c) or (d) GDPR), approved codes of conduct together with binding and enforceable commitments of the recipient (Art. 46(2)(e) GDPR), or approved certification mechanisms together with binding and enforceable commitments of the recipient (Art. 46(2)(f) GDPR).).

8. COOKIES POLICY

What are cookies?

Navigating on our Website may result in the installation of cookies on the user's computer. These are small files that a website saves on your computer or mobile device when you visit the website. Cookies are very common and used on a number of websites. Each cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value (usually a unique number).

Why are Cookies useful?

Cookies allow a website owner to do useful things such as for instance remembering your preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another. In general, the purpose of cookies is to improve the performance of the Website and the user's experience in using the Website.

We use session cookies to keep information about your navigation on our Website for different purposes namely to facilitate subsequent navigation on the Website and to allow various visitor figures to be compiled. Some cookies are essential to deliver a better experience on our Website and to help us understand how people use our Website.

Cookies present on the site are controlled by the Website and are accessed only by the Website owner or by people acting on its behalf. Additionally, cookies will not be used for any purpose other than the one stated above.

Solutions 30 use the following cookies on the websites.

Necessary cookies				
Name	Purpose	Descriptions	Storage period	
_icl_visitor_lang_ is	HTML	Stores the website language	Session	
cookie_notice_accepted	Cookie bar	Records that cookie notice has been accepted	6 months	
cookielawinfo-checkbox-necessary	Functional	To check if cookies can be placed.	1 year	
cookielawinfo-checkbox-non-necessary	Functional	To check if cookies can be placed.	1 year	
fusionredux_current_tab	Funcional	Essential WordPress theme cookie to maintain core site functionality.	7 days	
wpml_browser_redirect_test	Funcional	Tests if cookies are enabled.	1 year	
st_samesite	Social Networking	Used by ShareThis to track visitor's website navigation and preferences - This is used for internal statistics and marketing.	Session	
Third parties cookies				

Third parties cookies				
Name	Purpose	Descriptions	Storage period	
LOGIN_INFO	Marketing	Used by YouTube (Google) for storing user preferences and other unspecified purposes	2 years	
VISITOR_INFO1_LIVE	Marketing	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	6 months	
YSC	Marketing	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session	
Secure-3PAPISID	Marketing	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years	
Secure-3PSID	Marketing	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years	
Secure-3PSIDCC	Marketing	Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising.	1 year	

To learn more about third party cookies, please refer to third party websites (for example https://policies.google.com/technologies/cookies?hl=en-US)

While we do our best to keep this table updated, please note that the number and names of cookies may change from time to time.

Disabling, Deleting, or Opting Out of Cookies

If you do not want to have cookies placed on your device by third parties, many of them offer ways to opt out. In addition, most web browsers allow at least some control of most cookies through browser settings. You may refuse the use of cookies by selecting the appropriate settings on your browser to decline cookies. You may also delete existing cookies through your browser. However, please note that if you disable cookies, you may not be able to use the full functionality of our Website. In particular, you may have limited access to some areas or be transitioned to a different experience.

You may consult <u>AllAboutCookies.org</u> for details.

9. RETENTION PERIODS

Your Personal Data will be retained as long as necessary to provide you with the services and products requested. Once you have terminated the contractual relationship with us or the relationship with us has been otherwise ended, we will remove your Personal Data from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which Solutions 30 is subject).

If no exact retention periods are mentioned in this statement, we will only retain your Personal Data as long as it is necessary to fulfil the purpose for which it was originally collected and, if appropriate, as long as legally stipulated.

10. YOUR RIGHTS & REMEDIES

Right to withdraw your consent: If you have given your consent regarding certain types of processing activities (in particular regarding the receipt of certain direct marketing communications), you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent by writing to dpo@solutions30.com.

Additional data privacy rights: Pursuant to applicable data protection law and the GDPR, you have the right to: (i) request access to your Personal Data; (ii) request rectification of your Personal Data; (iii) request erasure of your Personal Data; (iv) request restriction of processing of your Personal Data; (v) request data portability; and/or (vi) object to the processing of your Personal Data. Please note that these rights might be limited under the applicable (local) data protection law.

(i) **Right to request access to your Personal Data:** you have the right to obtain from us confirmation as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the Personal Data undergoing processing free of charge. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

- (ii) **Right to request rectification**: you have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
- (iii) **Right to request erasure (right to be forgotten)**: you have the right to obtain from us the erasure of your Personal Data and we may be obliged to erase such Personal Data.
- (iv) **Right to request restriction of processing**: you have the right to obtain from us and we may be obliged to restrict the processing of your Personal Data. In this case, the respective Personal Data will be marked and may only be processed by us for certain purposes.
- (v) **Right to request data portability**: you have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those Personal Data to another entity without hindrance from us, where the processing is carried out by automated means and is based on consent pursuant to Art. 6(1)(a) GDPR or on a contract pursuant to Art. 6(1)(b) GDPR.
- (vi) **Right to object**: Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we are required to no longer process your personal data. Such right to object especially applies if we collect and process your Personal Data for profiling purposes in order to better understand your interests in our products and services or for certain types of direct marketing. If you have a right to object and if you exercise this right, your Personal Data will no longer be processed for such purposes by us.

To exercise your rights, please contact us as at dpo@solutions30.com. You also have the right to lodge a complaint with the competent data protection supervisory authority in the relevant Member State (e.g., the place where you reside, work, or of an alleged infringement of the GDPR).

11. QUESTIONS AND CONTACT INFORMATION

For any questions about this Privacy Policy or how we handle your Personal Data or you wish to exercise your rights as stated above in section 10, you may send an email to the following address: dpo@solutions30.com

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