



EU Data Protection Notice

1. INTRODUCTION AND SCOPE

Vibrantz Technologies Inc. and its subsidiaries and affiliates are committed to processing personal data responsibly and in compliance with the applicable data protection laws in all countries in which we operate.

This EU Data Protection Notice (the "Notice") describes the types of customer and vendor personal data we collect, use, share and the rights you, as a (potential) customer or vendor, have regarding our use of your personal data. This Notice also describes the measures we take to protect the security of the data and how you can contact us about our data protection practices.

2. CONTACT DETAILS OF THE DATA CONTROLLERS

The entities responsible for the collection and use of your personal data (Data Controllers) for the purposes described in this Notice are listed on <http://www.vibrantz.com/our-company/global-locations/>.

3. CONTACT DETAILS OF THE EU DATA PROTECTION COORDINATOR

At the pan-European level, an EU Data Protection Coordinator and at the country level, a Local Data Protection Champion have been designated. These positions are involved in all issues related to the protection of your personal data. The EU Data Protection Coordinator is in charge, in particular, of monitoring and ensuring compliance with this Notice and the applicable data protection laws and providing advice on data protection matters upon request.

For any clarification or additional information you may need in order to fully understand this Notice, please contact the EU Data Protection Coordinator by e-mail at DataProtection@Vibrantz.com or by telephone +31 10 4784 935.

4. PURPOSES OF DATA PROCESSING AND LEGAL BASIS

Vibrantz processes personal data in accordance with applicable data protection laws and only for limited, explicit and legitimate purposes.

We will not use personal data for any purpose that is incompatible with the purpose for which it was initially collected unless you provide your prior explicit consent for further use. We process customer and vendor personal data for the following purposes:

Purpose	Legal Basis
Managing commercial relationships with current and potential customers	Contract; Legal obligation
Managing commercial relationships with current and potential suppliers, vendors, service providers and/or contractors	Contract; Legal obligation
Conducting promotional and marketing activities	Legitimate interest
Conducting statistical surveys and marketing studies	Legitimate interest
Managing whistleblowing reports	Legitimate interest; Legal obligation

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As outlined above, Vibrantz also collects personal data in the context of the whistleblowing system available on our website at www.lighthouse-services.com/vibrantz-ethics. For additional information regarding the processing activities in the context of the Ethics Hotline system, please refer to our specific EU Ethics Hotline-Whistleblowing Data Protection Notice at [http://www.vibrantz.com/legal-privacy/EU Ethics Hotline - Whistleblowing Data Protection Notice.pdf](http://www.vibrantz.com/legal-privacy/EU%20Ethics%20Hotline%20-%20Whistleblowing%20Data%20Protection%20Notice.pdf).

For questions or additional information regarding the purpose and legal basis for processing personal data, you may contact the EU Data Protection Coordinator.

Vibrantz ensures that our internal governance procedures clearly specify the reasons behind decisions to use personal data for further processing purposes. Prior to using your personal data for a purpose other than the one for which it was initially collected, you will be informed about such new purpose.

5. PERSONAL DATA PROCESSED

The provision of personal data is a requirement necessary to enter into a contract with us or a requirement by law or regulation for us to administer your contractual relationship.

The personal data processed is limited to the data necessary for carrying out the purpose for which such personal data is collected.

Personal data processed includes the following:

- Business information (such as name of organization, phone number, email, department and job title);
- Contractual information (such as date of agreement, type of commercial relationship, etc.).

Vibrantz will not collect personal data if such collection is prohibited under the applicable data protection laws.

In any case, no personal data revealing racial or ethnic origin, political opinions, philosophical beliefs, or concerning sex life will be processed. Trade union membership and health-related personal data as well as religious beliefs may only be collected under very limited circumstances as provided and permitted by local data protection laws.

Vibrantz will maintain personal data in a manner that ensures it is accurate, complete and up to date.

6. DISCLOSURE OF PERSONAL DATA

6.1 At Vibrantz, we only grant access to personal data on a need-to-know basis and such access will be limited to the personal data that is necessary to perform the function for which such access is granted.

6.2 Subject to applicable law and regulations, we disclose personal data that we collect, or you provide as described in this policy:

6.2.1 Within our organization

- To authorized staff members employed by Vibrantz and our subsidiaries and affiliates.

6.2.2 Outside our organization

- To contractors, service providers and other third-parties we use to support our business or in connection with the administration and support of our business and who are bound by contractual obligations to keep personal data confidential and use it

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only for the purposes for which we disclose it to them (e.g., database hosting providers, managed services providers or consultants);

- To public authorities or government agencies pursuing judicial proceeding, court order or legal process or in the context of a formal investigation;
- To insolvency administrators in the event of company bankruptcy;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us is among the assets transferred;
- To fulfill the purpose for which you provide it. For example, if you request us to contact a third-party, we may transmit the contents of your request to the recipient;
- For other purposes only with your consent when required by applicable law and regulations;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, including for billing and collection purposes; or to protect the rights, property, or safety of our company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6.3 Authorisation to access personal data will always be linked to the function, so that no authorisation will be extended to access personal data on a personal basis. Service providers are legally and contractually required to abide by our instructions by the execution of data processing agreements when processing personal data and will only receive personal data according to the purposes of the service agreement with Vibrantz.

7. INTERNATIONAL DATA TRANSFERS

International data transfers refer to transfers of personal data outside of the EU.

The international footprint of Vibrantz involves a large number of transfers of personal data between different corporate entities, as well as to third parties located in various countries. This includes the transfer of personal data from EU Member States to countries outside of the EU considered as not providing adequate legal protection for the processing of personal data.

Vibrantz ensures that appropriate safeguards are implemented to secure such data transfers in compliance with applicable data protection laws. Vibrantz has implemented international data transfer agreements based on EU Standard Contractual Clauses to cover our international data transfers and a copy of these clauses can be obtained by contacting the EU Data Protection Coordinator.

8. RETENTION PERIOD OF PERSONAL DATA

Vibrantz will not retain your personal data longer than allowed under the applicable data protection laws. In any case, we will not retain it longer than such personal data is necessary for the purpose for which it was collected or otherwise processed, subject to applicable local retention requirements.

9. YOUR DATA PROTECTION RIGHTS

Under applicable data protection laws, you will benefit from the rights listed in this section.

These rights can be exercised by you at any time by contacting the EU Data Protection Coordinator.

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9.1 Right to access

You are entitled to obtain confirmation from us as to whether any personal data concerning you is processed by us.

In the affirmative, you have the right to access such personal data, to obtain a copy of it free of charge (except for repetitive or excessive requests) and to be provided with the following information:

- (i) purposes of such processing,
- (ii) categories of personal data concerned,
- (iii) recipients or categories of recipients of personal data, in particular recipients in third countries outside the EU,
- (iv) the envisaged retention period or, if not possible, the criteria used to determine it,
- (v) existence of the right to request rectification or erasure of personal data, as well as the right to object to or request restriction of processing,
- (vi) the right to lodge a complaint with a supervisory authority,
- (vii) information relating to any third-party source of personal data if the data were not collected from you, and
- (viii) the existence, the logic involved, the significance and the consequences of any automated decisions, including profiling.

Where personal data is transferred outside of the EU, you will be informed of the appropriate safeguards relating to such transfer.

9.2 Right to rectification

You have the right to obtain without undue delay the rectification of inaccurate, incomplete or outdated personal data concerning you.

9.3 Right to erasure

You have the right to obtain without undue delay the erasure of your personal data in one of the following cases:

- The personal data is no longer necessary in relation to the purpose(s) for which it was collected or otherwise processed;
- You withdraw the consent on which the processing was based, and there are no other legal grounds for the processing;
- You object to the processing, as provided in section 9.5 below;
- Your personal data has been unlawfully processed;
- Your personal data must be erased for compliance with a legal obligation in the EU or EU Member State law.

However, Vibrantz may refuse the erasure of personal data if the processing of such data is necessary for:

- (i) exercising the right of freedom of expression and information;
- (ii) compliance with a legal obligation which requires processing by EU or EU Member State law or for the performance of a task carried out in the public interest;
- (iii) reasons of public interest in the area of public health, scientific or historical research purposes or statistical purposes;
- (iv) establishment, exercise or defence of legal claims; or
- (v) compliance with a legal obligation which requires us to maintain backups of your data for the relevant retention period.

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9.4 Right to restriction

You have the right to obtain restriction of processing in the following cases:

- Where you claim inaccuracy of your personal data processed by Vibrantz (the restriction being provided for a period enabling us to verify the accuracy);
- Where the processing appears unlawful, and you oppose the erasure and request the restriction of use of your personal data instead;
- Where Vibrantz does not need your personal data for the purposes of processing, but the personal data is required by you for the establishment, exercise or defence of legal claims; and
- Where an objection is raised by you in relation to the processing, pending the verification whether the legitimate grounds of Vibrantz override those of you.

When you have obtained a restriction of processing of your personal data, you will be informed prior to lifting of such restriction.

9.5 Right to object

As a general rule, you have the right to object, at any time and on legitimate grounds relating to your particular situation, to the processing of your personal data.

Provided that such objection is justified, Vibrantz will no longer process the personal data concerned unless we can demonstrate compelling legitimate grounds for the processing which override your interests.

9.6 Right to data portability

In cases where the data processing is based on your consent or on your contract and where such processing is carried out by automated means, you can request us (i) to communicate to you the personal data concerning you, in a structured, commonly used and machine-readable format, in order to be able to further transmit such personal data to another data controller, or (ii) to directly transmit such personal data to such other data controller, if technically feasible.

However, Vibrantz can refuse such request if the processing concerned is necessary for the performance of a task carried out in the public interest or if responding to such request risks to adversely affect the rights and freedoms of others.

9.7 Right to withdraw consent

Where the processing of your personal data is based on consent, you have the right to withdraw such consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

9.8 Right to lodge a complaint

You also have the right to lodge a complaint with the competent supervisory authority.

10. POLICY COMPLIANCE

The EU Data Protection Coordinator is responsible for the monitoring and ensuring compliance with this Notice under applicable data protection laws.

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As mentioned above, you may contact the EU Data Protection Coordinator regarding any issue related to processing of your personal data and to exercise your rights as mentioned in section 9 above.

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