

## SECOYA – DATA PROTECTION POLICY

SECOYA Technologies srl acts as a data controller when it processes personal data of its clients, prospects, suppliers, partners or other third parties or, where these are companies, their contact persons and representatives (“data subjects” or “you”) in accordance with the General Data Protection Regulation n° 2016/679 (hereafter “GDPR”) and the applicable national laws. It also processes personal data of candidates for employment or internship (“data subjects” or “you”), as a data controller.

- Management of business relations. SECOYA processes personal data for the management of business relations, to the extent that this is necessary for serving the legitimate interests of SECOYA and its clients, suppliers and partners, i.e. the potential collaboration or performance of the contract between SECOYA and the third party. SECOYA process the personal data of the contact person provided, such as name, surname, e-mail address, phone number, company and their professional position.

SECOYA will store these personal data for the duration of the collaboration between SECOYA and the company, which you represent or for 12 months after the last contact.

- Recruitment. SECOYA processes personal data for recruitment purposes, in order to take steps prior to potentially concluding a contract, at the request of the candidate for an employment position or an internship.

SECOYA will store these personal data for the duration of the recruitment process and 12 months after its end.

The personal data will not be shared with third parties for commercial purposes but they may be disclosed to recipients, such as processors (such IT service providers, including cloud services or hosting providers), service providers (such as accountants), commercial partners (including their affiliates), investors or auditors.

SECOYA may transfer personal data to recipients located in countries outside the European Economic Area, but it undertakes to do so in accordance with European Commission’s adequacy decisions or, in the absence of the same, in accordance with the standard contractual clauses adopted by the European Commission.

As a data subject, you are entitled to request access to your personal data, provided that the legal conditions be met, rectification or erasure of their personal data, restriction of processing, portability of the personal data and you have the right to object to the processing of your personal data on grounds relating to your particular situation. You can exercise these rights by sending an email to [info@secoya-tech.com](mailto:info@secoya-tech.com), providing proof of your identity.

Data subjects are entitled to lodge a complaint with the Belgian Data Protection Authority. More information can be found on the website of the authority, via <https://www.dataprotectionauthority.be/procedures>.