



# Netlight's Privacy Policy

We are Netlight and we protect your personal integrity. We strive for a high level of data protection and this privacy policy (the “**Policy**”) explains how we collect and use your Personal Data. It also describes your rights and how to exercise them. It is important that you read and understand this Policy.

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## What is “Personal Data” and processing of such?

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### Personal Data

Personal Data is any information that can be directly or indirectly related to an identified or identifiable natural person, i.e., to you, the “**data subject**”. Personal Data includes for instance photos as well as encrypted information if it is relatable to a data subject. A data subject could be any natural person who is in contact with Netlight, including but not limited to, employees, clients, suppliers or visitors.

### Processing

Processing means any operation or set of operations which is performed on Personal Data, whether or not by automated means. Common processing activities include, but are not limited to, collection, recording, organisation, structuring, storage, alteration, disclosure by transmission, restriction and destruction.

## Who is responsible for the Personal Data we collect?

Each Netlight Group entity is responsible for its own processing of collected Personal Data processed within the entity and is hence, for the purpose of the General Data Protection Regulation ((EU) 2016/679), the “**data controller**” of your Personal Data. The “**Netlight Group**” consists of the following entities:

- Netlight Consulting AB, Reg. No. 556575-6227, Regeringsgatan 25, 111 53 Stockholm, Sweden
- Netlight AS, Reg. No. 991 952 802, Karl Johans Gate 23B, 0159 Oslo, Norway
- Netlight Consulting GmbH, Reg. No. HRB 189944, Prannerstraße 4, DE-80333 Munich, Germany
- Netlight Consulting Oy, Reg. No. 2517964-1, Norra Esplanaden 33 A, 00100, Helsinki, Finland
- Netlight Consulting AG, Reg. No. CHE 189437853, Morgartenstrasse 6, 8004 Zurich, Switzerland
- Netlight Consulting ApS, Reg. No. 38886851, Knabrostræde 3A, 4., 1210 København K, Denmark
- Netlight Consulting Ltd, Reg. No. 04085885, Herschel House, 58 Herschel Street, Slough, SL1 1HD, United Kingdom
- Netlight Consulting B.V., Reg. No. 83846832, Herengracht 498, 107CB Amsterdam, The Netherlands

### Joint controllers

Netlight is an international network organisation. Therefore, data flows over national borders are required in certain defined areas described below.

- Recruitment – striving to find the best talents available
- Communication and collaboration – to be able to work on projects of mutual interest within the Netlight Group

- Management and planning – to facilitate and improve cross border projects, initiatives, business trips, relocations, relations and transactions

When you are part of one or more of the above mentioned dataflows, your Personal Data might be shared to other Netlight Group entities. The Netlight Group entity you have been in contact with and the entity to which your data is shared are joint controllers of your data. See section 0 below for further details for those processing activities.

## Supervising Authorities

If you have any comments or complaints about our processing of your Personal Data, you may contact the authorized supervisory authority in the jurisdictions listed below. Each supervisory authority is responsible for monitoring compliance with the law, and if you believe that Netlight handles your Personal Data improperly, you may file a complaint to the supervisory authority.

- [Integritetsskyddsmyndigheten](#)  
Box 8114, 104 20 Stockholm
- [Datatilsynet](#)  
Postboks 458 Sentrum, 0105 Oslo
- [Bayerisches Landesamt für Datenschutzaufsicht \(BayLDA\)](#)  
Promenade 18, 91522 Ansbach
- [Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit](#)  
Klosterwall 6 (Block C), 20095 Hamburg
- [Berliner Beauftragte für Datenschutz und Informationsfreiheit](#)  
Friedrichstr. 219, 10969 Berlin
- [Der Hessische Beauftragte für Datenschutz und Informationsfreiheit](#)  
Postfach 3163, 65021 Wiesbaden
- [Landesbeauftragte für Datenschutz und Informationssicherheit Nordrhein-Westfalen](#)  
Kavalleriestr. 2-4, 40213 Düsseldorf
- [Tietosuojavaltuutettu](#)  
PL 800, 00521 Helsinki
- [Federal Data Protection and Information Commissioner](#)  
Feldeggweg 1, CH - 3003 Berne
- [Datatilsynet](#)  
Borgergade 28, 5., 1300 København K
- [Autoriteit Persoonsgegevens](#)  
PO Box 93374, 2509 AJ Den Haag

## Summary

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### We need your Personal Data

As your potential employer, supplier or business partner, we need to be able to process your Personal Data for various reasons. In simple terms, we use your data for the purposes of managing:

- **your recruitment process** - for example, in order to source talents, create and conclude an employment contract, as well as in order to manage and plan our recruitment needs

- **the business** - for example, in order to book client meetings, plan staffing, organize schedules, managing leave and producing reports and statistics, maintaining and improving our services as well as in order to develop new services and measure our performance.
- **internal and external communication** - for example, when you communicate with us for business reasons
- **security** - for example, when issuing entry passes and managing and securing our IT systems and services
- **hosting and administering events** - for example, in order to correspond with participants and suppliers before, during, and after the event, to manage food orders or applications, to identify the participants and – in the event of a competition – to announce and correspond with the winner.

Please see section 3 [“Why we process your Personal Data”](#) for further information.

### **We use your data when communicating with others**

When communicating with other parties such as public authorities and advisors, suppliers or any other service providers of Netlight, we may be obliged, or it may be necessary, to share your Personal Data with. Please see section 0-0, section 0 and section 0 for further information regarding sharing of your Personal Data with other recipients.

### **We store your data only as long as it is required**

We store your Personal Data only as long as we need to in order to fulfil our purpose for processing it. We will then safely erase or anonymize your data so that it can no longer be linked to you. Please see [“How long do we store your Personal Data?”](#) for further information.

### **Your rights**

You have certain rights connected to the Personal Data we store. You have the right to:

- request access to your Personal Data (a so-called “register extract”)
- request rectification
- revoke previously given consent with future effect
- object to processing which is based on our legitimate interests
- request your Personal Data to be erased or the processing of your data to be restricted in some cases
- be provided with a copy in a structured and machine-readable format (for data portability) of personal details which you yourself have submitted

Please see [“Remember your rights”](#) for further information.

## **Why we process your Personal Data**

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### **Personal Data processed within our recruitment process**

#### **Purpose**

Netlight processes Personal Data for the purpose of finding new employees or to reply to your application, e.g., in order to be able to contact you, administer your recruitment process and any other day-to-day activity within the scope of your recruitment process, as well as to create and conclude an employment contract. We might further process Personal Data to maintain and improve our recruitment process, to personalize it and to measure its performance. The following Personal Data may be processed in accordance with the above purpose:

- Contact information (including name, address, e-mail address and telephone number)
- Government ID (including social security number, personal number, passport copy)
- Sex or gender
- Date of birth
- Information pertaining to your health
- Working experience
- Business title
- Organizational belonging
- Department
- Employment lifecycle dates (start and end dates)
- Employee demographics (including sex, gender and age)
- Information regarding secondary employments
- If applicable, work permit and/or residence permit
- Additional information from CV voluntarily submitted (e.g., photos or personal interests)

### **Legal basis**

Personal Data processed in accordance with this section is processed on the basis of being a necessity in order to enter into an employment agreement with you and in order to fulfill Netlight's legitimate interest of being able to respond to your application, to recruit new employees, plan work distribution and conduct staffing planning, and to review your work performance. Your Personal Data is further processed to fulfill Netlight's legitimate interest of maintaining and improving as well as personalizing and measuring the performance of our recruitment process. For example, we use the Personal Data we collect to analyze and understand how you interact with Netlight and how you, amongst other things, experience the recruitment process. It helps us to discover that, for example, certain measures or initiatives are more efficient than others (e.g., certain recruitment campaigns). Such discoveries help us to redesign the process and improve it for both Netlight and you.

## **Personal Data processed in connection with Netlight events**

### **Administration of events**

#### **Purpose**

Netlight processes Personal Data for the purpose of hosting and administrating events, for example to correspond with participants and suppliers before, during, and after the event, to

manage food orders or applications, to identify the participants and – in the event of a competition – to announce and correspond with the winner. The following Personal Data may be processed within the scope of hosting and administrating events:

- Contact information (including name, address, e-mail address and telephone number)
- Government ID (including social security number, personal number, passport copy, work permits)
- Sex or gender
- Date of birth
- Information voluntarily submitted (e.g., in email conversations or via applications or evaluations)
- Business title
- Health related data voluntarily submitted (e.g., information about allergies)
- Emergency contact (voluntarily submitted)

Netlight will further use and store your Personal Data for sending you newsletters and e-mails using mailing lists, which contain information about Netlight and its upcoming events, as well as for documenting your consent. Personal Data processed for these purposes may include for example:

- Contact details (including name, email and phone number)
- Notification preferences

### **Legal basis**

Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of managing and administrating events as well as your legitimate interest to participate in said events and, where applicable, to fulfill Netlight's legal obligations as set out in section 0 below. Personal Data processed for the purpose of sending newsletters and e-mails using mailing lists is processed on the basis of your consent.

## **When you participate in Netlight events**

### **Purpose**

When you participate in Netlight events, Netlight may process your Personal Data for the purposes described in section 3.3 below. Accordingly, Personal Data processed for this purpose may include:

- Photos or videos of you from events

### **Legal basis**

Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of cultivating our network, maintaining our culture and ensuring knowledge sharing. Netlight will further process your Personal Data on the basis of Netlight's legitimate interest to publish information about our business on our website, in printed materials and on social media as well as to market our business through such platforms.

## Personal Data processed to maintain a social media presence

### Purpose

Netlight is a value-based network and knowledge sharing organization. It is essential for us to share knowledge as well as to organize events since this is a key part of becoming who we are – pioneers and creators of the digital future. We use LinkedIn, Twitter, Facebook, Instagram, YouTube and Vimeo to have a dialogue with our clients and recruits as well as with our employees. Seeing as the Netlight entities are spread over different parts of Europe, social media is a very valuable tool in terms of taking care of our cross-border and cross-functional relationships while also fostering our ONE-Netlight culture. Netlight will therefore process your Personal Data for the purpose of visualizing our values, culture and everyday work by posting photos from, for example, summits as well as from internal and external events. You are entitled to ask Netlight to remove any photos of you from our social media accounts at any time. Personal Data processed for this purpose may include:

- Photos or videos of you from events, conferences, meetings, workshops, interviews and articles

### Legal basis

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of cultivating our network, maintaining our culture and ensuring knowledge sharing. Netlight will further process your Personal Data on the basis of Netlight's legitimate interest to publish information about our business on our website, in printed materials and on social media as well as to market our business through such platforms.

## Personal Data processed whilst performing client assignments

### Purpose

In order for Netlight to deliver our services in accordance with both Netlight's and our clients' expectations, Netlight will process Personal Data for the purpose of fulfilling our assignments and to communicate with applicable counterparties or other parties connected to the assignment. Netlight will further process Personal Data for administering payments, invoicing and bookkeeping as well as scheduling meetings. Netlight will also process Personal Data to provide efficient and accurate documentation and administration with respect to the assignment and to facilitate an efficient process. Personal Data processed for the purposes above may include:

- Contact information (including name, address, e-mail address and telephone number)
- Government ID (including social security number, personal number, passport copy)
- Sex or gender
- Date of birth
- Business title
- Organizational belonging



- Department
- Information voluntarily submitted (e.g., in email conversations)
- Financial information (e.g., invoicing details)
- Scope of the assignment

### **Legal basis**

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of fulfilling our assignments and client agreements and, where applicable, to fulfill Netlight's legal obligations as set out in section 0 below.

## **Personal Data processed for communication and client relation management purposes**

### **Purpose**

Netlight will process your Personal Data to manage client relations and to correspond with clients and prospective clients. That includes concluding and executing client agreements, evaluating and providing feedback on assignments (both during and following the termination of assignments), participating in tenders and administrating access to our services. Personal Data processed for these purposes may include for example:

- Contact details (including name, email and phone number)
- If applicable, social security relevant information (social security number)
- Information voluntarily submitted (e.g., in email conversations)
- Financial information (e.g., if our client is operating as a sole trader)

### **Legal basis**

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of managing customer relations and corresponding with clients and prospective clients and in order to fulfil or enter into a client agreement and, where applicable, to fulfill Netlight's legal obligations as set out in section 0 below.

## **Personal Data processed for communication and supplier relation management purposes**

### **Purpose**

Netlight will process your Personal Data to manage supplier relations and to correspond with suppliers and prospective suppliers. That includes concluding and executing a supplier agreement as well as evaluating and providing feedback on a supplier's services (both during and following the termination of supplier's provision of such services). Personal Data processed for these purposes may include for example:

- Contact details (including name, email and phone number)
- If applicable, social security relevant information (social security number)
- Information voluntarily submitted (e.g., in email conversations)

- Financial information (e.g., if our supplier is operating as a sole trader)

### **Legal basis**

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of managing supplier relations and corresponding with suppliers and prospective suppliers and in order to fulfil or enter into a supplier agreement and, where applicable, to fulfill Netlight's legal obligations as set out in section 0.

## **Personal Data processed for investor relations purposes**

### **Purpose**

Netlight will process your Personal Data to manage investor relations and to correspond with investors and prospective investors. That includes concluding and executing an agreement or providing and exchanging information. Personal Data processed for these purposes may include for example:

- Contact details (including name, email and phone number)
- Date of birth
- Social security relevant information (social security number)
- Financial information

### **Legal basis**

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of managing investor relations and corresponding with investors and prospective investors and, where applicable, to fulfill Netlight's legal obligations as set out in section 0 below.

## **Personal Data processed to fulfill legal obligations**

### **Purpose**

Netlight will process your Personal Data in order to fulfill its legal obligations, for example in the area of company law, market abuse regulations or bookkeeping and tax legislation. Personal Data processed for these purposes may include for example:

- Contact details (including name, email and phone number)
- Date of birth
- Social security relevant information (social security number)
- Financial information

### **Legal basis**

Your Personal Data processed in accordance with this section is processed as it is necessary in order for Netlight to fulfill its legal obligations.

## Personal Data processed in order to conduct internal investigations

### Purpose

Netlight will process your Personal Data for the purpose of conducting internal investigations relating to e.g., breach of laws and/or attacks on Netlight's IT-architecture. Such internal investigations will only be conducted due to specific suspicions and upon the prior decision from Netlight's CEO or CFO as well as within legally permissible limits. Internal investigations include review of e-mail correspondence, data from CCTV-recordings, electronic documents and other information repositories and activities on the Internet whilst using Netlight IT-devices. Personal Data processed for this purpose may include the following, whenever and to the extent necessary:

- Contact information (including name, address, e-mail address and telephone number)
- Business title
- Department
- Personal Data in e-mail correspondence
- Internet behavior such as visited web sites and time as well as scope of access
- Name of accessed or downloaded files and time of access
- Technical log information (including when you logged in to the Netlight IT-infrastructure) and IP-address

### Legal basis

Your Personal Data processed in accordance with this section is processed on the basis of Netlight's legitimate interest of identifying, investigating and preventing unlawful actions against Netlight.

## Personal Data processed in order to establish, exercise and defend legal claims

### Purpose

Netlight will process your Personal Data for the purposes of establishing, exercising and defending potential legal claims. Personal Data processed for these purposes may include the following data, whenever and to the extent necessary:

- Contact information (including name, address, e-mail address and telephone number)
- Business title
- Personal Data in e-mail correspondence
- Internet behavior such as visited web sites and time as well as scope of access
- Name of accessed or downloaded files and time of access
- Technical log information (including when you logged in to the Netlight IT-infrastructure) and IP-address
- Any other information necessary to achieve the purpose of the processing.

### Legal basis

Your Personal Data processed in accordance with this section is processed on the basis of a balancing of interests. Netlight has a legitimate interest to process your Personal Data for these purposes in order to be able to establish, exercise and/or defend legal claims for example in the event of a dispute or controversy between you and Netlight and, if applicable, to exercise its rights and obligations under law.

## From which sources do we collect your Personal Data?

The main part of the Personal Data we collect is derived from you, for example your name, CV and similar as well as information provided by you in e-mails or by other means whilst communicating with us for any reason. We also collect Personal Data from third parties such as social media (for example LinkedIn or Xing), public webpages and other data controllers acting on our behalf (for example recruitment agencies).

## With whom do we share Personal Data?

### Netlight Group entities

We transfer Personal Data to other Netlight group entities, for example if you apply for a position at one office but are also open for positions in other countries where we operate, or if you are working at a supplier or client which is conducting businesses with more than one Netlight Group entity. Further details are set out in the table below.

Recipient	Purpose of transfer	Legal basis	Categories
The Netlight Group company you want to seek employment at	To administrate recruiting and relocation processes, for example if you are applying for a job at more than one Netlight Group company.	To fulfill our legitimate interest of administering recruitment and relocation as well as in some cases to fulfill the employment contract with you if a relocation has been contractually agreed.	<ul style="list-style-type: none"> <li>Please see <a href="#">section 0</a></li> </ul>
The Netlight Group company hosting the summit (employee conference)	To administrate our summits (employee conferences), for example to send participation information or supplier information to the hosting Netlight Group company.	To fulfill our legitimate interest of administering employee conferences.	<ul style="list-style-type: none"> <li>Contact information</li> <li>Government ID</li> <li>Department</li> <li>Date of birth</li> <li>Passport and Visa Information</li> <li>Nationality</li> <li>Travel and food preferences</li> </ul>

Recipient	Purpose of transfer	Legal basis	Categories
Netlight Group entities	To support efficient and effective communication and collaborations on projects of mutual interest within the Netlight Group.	To fulfill our legitimate interest of administering and supporting effective communication and collaborations to facilitate cross border projects, relations and transactions.	<ul style="list-style-type: none"> <li>Please see <a href="#">section 0-0</a></li> </ul>
Netlight Group entities	To support efficient and effective management and planning within the Netlight Group as well as to maintain and improve our services and processes, to personalize such services and processes and to measure performance.	To fulfill our legitimate interest of administering and supporting management and planning to facilitate and improve cross border projects, initiatives, relations and transactions. Also including our legitimate interest of maintaining and improving as well as personalizing and measuring the performance of such services or processes. For example, we use the Personal Data we collect to analyze and understand how you interact with Netlight and how you, amongst other things, experience the recruitment process. It helps us to discover that, for example, certain measures or initiatives are more efficient than others (e.g., certain recruitment campaigns). Such discoveries might help us to redesign the process and improve it for both Netlight and you.	<ul style="list-style-type: none"> <li>Statistical information, reports, and summaries used for the purposes of assessing, reviewing and implementing Netlight Group initiatives or projects, which include information that could reveal Personal Data as listed in this Policy.</li> </ul> <p>In respect of the above, Netlight Group will as far as reasonably practical, anonymize or pseudonymize Personal Data contained in such statistics, reports and summaries to minimize the amount of Personal Data shared.</p>

The Netlight Group entity which you have been in direct contact with and the Netlight Group entity with which your Personal Data is shared are joint controllers of your Personal Data for the above-mentioned purposes. To exercise any of your rights in relation to the above-mentioned processing of Personal Data where there are joint controllers, please see section 8 below. The Netlight Group entity which you have been in direct contact with is responsible for complying with your request. However, remember that you are free to exercise your rights in respect of and against each of the controllers. A list of Netlight Group entities can be found at section 0, Processing means any operation or set of operations which is performed on Personal Data, whether or not by automated means. Common processing activities include, but are not limited to, collection, recording, organisation, structuring, storage, alteration, disclosure by transmission, restriction and destruction.

## Who is responsible for the Personal Data we collect?

### Data processors

We will normally disclose Personal Data to external parties, who help us with e.g., recruitment, IT support and hosting services, accounting services and event planning. These external parties process Personal Data under the instructions of Netlight (sub-processors) and will not process your Personal Data for any other purpose than to fulfil their obligations under their agreement with Netlight.

Where such disclosure entails transfers of Personal Data outside of the EEA, Netlight will ensure that the European Commission's Standard Contractual Clauses have been entered into between the transferring Netlight entity and the receiving external party. Alternatively, other safeguards will be put in place prior to such transfers, such as any adequacy decisions issued by the EU Commission enabling data transfers outside of the EEA.

You are, if so, provided under applicable data privacy law upon request, entitled to receive a copy of documentation demonstrating that appropriate safeguards have been taken in order to protect your Personal Data during a transfer outside of the EEA regardless of whether it is an intra-group transfer or a transfer to an external party.

A list of the countries located outside of the EEA, to which your Personal Data may be transferred, can be found below.

### International data transfers

The processors Netlight engage to process Personal Data under our instruction may, provided that appropriate safeguards have been deployed, transfer Personal Data to the following countries outside the EU/EEA.

- USA
- Canada
- Australia
- Japan
- Singapore

## Other data controllers

Recipient	Purpose of transfer	Legal basis
Clients	To conclude client agreements and comply with our obligations connected to such.	To fulfill our legitimate interest of administering client (and potential client) relations as well as developing and maintaining our business.
Travel agencies, airlines and other transportation companies	To facilitate your booking and to carry out business travel, including to accommodate your requests for travel arrangements and to meet regulatory requirements of visas and other cross border travel requirements.	To fulfill your and our legitimate interest of facilitating business travels.
Governmental authorities	To fulfill legal obligations in the areas of tax, social security, anti-fraud and anti-money laundering legislation.	Fulfillment of legal obligations.
Courts and arbitral tribunals	To exercise, establish or defend legal claims.	To fulfill your and our legitimate interest to have disputes settled by competent courts and arbitral tribunals.
Suppliers	To conclude supplier agreements and comply with our obligations connected to such.	To fulfill our legitimate interest of administering supplier (and potential supplier) relations as well as developing and maintaining our business.
Trade unions, work councils and employer organizations	To fulfill our legal obligations in the field of employment law, for example consultation obligations in relation to re-organizations, mergers and acquisitions.	To fulfill our legal obligations in the field of employment law.
Social media companies	To visualize Netlight's values, culture and everyday work. To maintain a transparent, effective and fair dialogue with our clients, recruits and employees.	To fulfill our legitimate interest of maintaining a transparent and fair dialogue with our clients, recruits and employees as well as our legitimate interest to publish information about our business on our website, in printed materials and on

Recipient	Purpose of transfer	Legal basis
		social media as well as to market our business through such platforms

## Protection of your Personal Data

We work with both digital and physical measures to protect the privacy and integrity of as well as access to your Personal Data. We have taken special and adequate security measures to protect your Personal Data from unauthorized use (such as unauthorized access, loss, destruction or damage). Only the people who need to process your Personal Data for us to fulfil our above stated purposes has access to them.

To further ensure the security of your Personal Data and compliance when processing of such Netlight has, in addition to this Policy, implemented an Information Security Policy and conducts regular trainings to maintain compliance within these areas.

## How long do we store your Personal Data?

Netlight will store Personal Data for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer storage period is required for legitimate reasons or required by law. The methods and criteria used to determine the storage periods include: (i) as long as you have an ongoing recruitment process with Netlight, but sooner if the purpose have been fulfilled and no legitimate reasons exists for continuing to store the data; (ii) as long as you have an ongoing business relationship with Netlight, but sooner if the purpose have been fulfilled and no legitimate reasons exists for continuing to store the data; (iii) as required by a legal obligation to which Netlight is subject (for example to retain bookkeeping materials); (iv) to meet applicable statutes of limitations, for example to exercise, establish or defend claims in litigation or investigations; and (v) in cases where Netlight's processing has been based on your consent only, until you revoke your consent.

## Remember your rights

### Right to access

Netlight is transparent on how we process your Personal Data. If you would like to have further insights on what Personal Data we process about you, you have the right to receive access to the Personal Data together with an extract containing information about the purposes of the processing; the categories of Personal Data concerned; categories of recipients; envisaged storage periods; information about where the Personal Data has been collected if it has not been collected from you, and existence of automated decision-making.

Please note that we may be required to ask you for additional information if you use your right to access. This must be done to ensure that the Personal Data is disclosed to the correct person and to facilitate an efficient process.



### **Right to rectification**

You always have the right to correct inaccurate Personal Data. Subject to purposes of the processing, you also have the right to complete any incomplete Personal Data.

### **Right to revoke previously given consent with future effect**

You have the right to have Netlight erase your data if you withdraw consent and Netlight's processing has been based on your consent only.

### **Right to erasure**

Also known as “the right to be forgotten”. You are entitled to request to have your Personal Data erased, which we process if:

- The Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed
- You object against our legitimate interest and your reasons for objecting overrides our legitimate interest
- You object against processing for direct marketing purposes
- The Personal Data has been unlawfully processed
- The Personal Data must be erased for compliance with a legal obligation to which Netlight is subject to

Please note that we have the right to deny your request should there be any legal obligations, which prevents us from erasing your Personal Data immediately. Such obligations may be due to bookkeeping and tax legislation, but also due to banking and money laundering legislation. Such may also be the case if the processing is necessary for us to establish, exercise or defend legal claims. If we cannot meet your request, we will instead restrict the processing of your Personal Data so that it may not be processed for any other purposes than those that denies the request for erasure.

### **Right to restriction**

You have the right to request that our processing of your Personal Data is restricted. If you believe that the Personal Data we process is inaccurate, you have the right to request that the processing is restricted during the time we need to ensure whether the Personal Data are correct or not. Furthermore, if Netlight no longer needs your Personal Data for the described purposes, but you need them to establish, exercise or defend legal claims, you have the right to request that we restrict your Personal Data, i.e., you have the right to request that we do not delete your Personal Data.

### **Right to objection**

You may object to any processing of your Personal Data processed on the basis of a legitimate interest, on grounds relating to your particular situation.

### **Data portability**

You have the right to receive a machine-readable copy of the Personal Data processed on the basis of your consent or on the basis that the processing is necessary in order to perform a contract to which you are a party, and which Personal Data have been provided to Netlight by you.

## How to exercise your rights

To exercise your rights as a data subject, please send an e-mail to Netlight's data privacy team. Netlight's Data privacy team as well as Netlight GmbH's Data Protection Officer can be reached at [dataprotection@netlight.com](mailto:dataprotection@netlight.com).