

Tacita LTD PRIVACY NOTICE

At Tacita Limited (Tacita), respecting your data privacy rights is a top priority. This notice explains why and how we collect personal data about you, how we may process such data, and what rights you have regarding your personal data.

This notice is laid out such that the general provisions are at the top of this notice and you can then select the data subject type that you wish to view the relevant information.

We collect and process your data based on the type of data subject that you are. Please click on the most relevant category(ies) of data subject for your situation and this will take you to the section that describes what data we collect and the reason and justification for processing for that data subject category.

Please read the General Information and then click on the Data Subject Type that you are, as set out below.

Privacy Notice Contents

- [General Information](#)
- [Employees or potential Employees](#)
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GENERAL INFORMATION

The information in this section is relevant to all categories of data subject.

Who controls your personal data?

Tacita Ltd is responsible for your personal data. You can contact a representative by sending an email to the following address:

contact@tacita.io

Your rights

You have the following rights:

1. The right to be informed.
 - You have the right to be informed about how Tacita processes your personal data. Typically, Tacita communicates this information through privacy notices such as this one.
2. The right of data access
 - You have a right to obtain a copy of the personal data we hold about you, subject to certain exceptions.
3. The right of data rectification
 - You always have a right to ask for immediate correction of inaccurate or incomplete personal data which we hold about you.
4. The right of data erasure
 - You have the right to request that personal data be erased when it is no longer needed, where applicable law obliges us to delete the data or the processing of it is unlawful. You may also ask us to erase personal data where you have withdrawn your consent or objected to the data processing. However, this is not a general right to data erasure – there are exceptions.
5. The right to restrict data processing
 - You have the right to restrict the processing of your personal data in specific circumstances. Where that is the case, we may still store your information, but not use it further.
6. The right to data portability
 - You have the right to receive your personal data in a structured, machine-readable format for your own purposes, or to request us to share it with a third party.
7. The right to object to data processing
 - You have the right to object to our processing of your personal data based on the legitimate interests, where your data privacy rights outweigh our reasoning for legitimate interests.
8. Rights in relation to automated decision making and profiling.
 - You have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects. Currently, Tacita does not perform any automated decision making or profiling.

You may request to enforce your data privacy rights by emailing contact@tacita.io

In certain circumstances, we may need to restrict the above rights to safeguard the public interest (e.g., the prevention or detection of crime) or our business interests (e.g., the maintenance of legal privilege).

Consent as a legal basis for processing

For some data processing, Tacita uses consent as a legal basis. If you have consented to processing by Tacita, please be aware that you have the right to withdraw this consent at

any point. If you would like to withdraw consent for a particular type of data processing that Tacita performs, please email the following address:

contact@tacita.io

Complaints to a Supervisory Authority

You have the right to lodge a complaint with a supervisory authority with regards to the way that Tacita processes your personal data. Tacita recommends lodging a complaint with the 'Information Commissioner's Office (ICO)'. This is the UK's supervisory authority and is the one which Tacita is registered with.

How we share your data

We will not share your information with any third parties for the purposes of direct marketing.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example under a court order. In any scenario, we will satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

How we protect your information

We implement appropriate technical and organisational measures to protect personal data that we hold from unauthorised disclosure, use, alteration, or destruction. Where appropriate, we use encryption and other technologies that assist in securing the data you provide. We also require our service providers to comply with strict data privacy requirements where they process your personal data.

How long we keep your personal data

We only keep your personal data for as long as necessary for the purposes described in this privacy notice, or until you notify us that you no longer wish us to process your data. After this time, we will securely delete your personal data, unless we are required to keep it to meet legal or regulatory obligations, or to resolve potential legal disputes.

Contact and further information

If you have any questions about how we use your personal data or wish to make a complaint about how we handle it, you may contact Tacita at: contact@tacita.io

EMPLOYEES OR POTENTIAL EMPLOYEES

The types of information we collect and use

We collect and use personal data that concerns you in connection with your employment at Tacita. We may collect the following categories of personal data:

- **Personal details and identification data** such as name, personal and business address, personal and business telephone number, personal and business email address or any other contact details, date, and country of birth.
- **Personal data related to family and social circumstances** such as gender, age, marital and family status (including the name and contact details of the next of kin).
- **Employment related personal data** such as: signature, employment status, national insurance numbers, insurance number, country of residence, nationality, photo, emergency contacts, passport information, work and residence permit, immigration status and travel visa information.
- **Qualifications** such as qualifications and certifications including current and previous positions, education and training courses, resume/CV, records of education and work achievements, in some cases: contact details of referees and results of capability assessments and interview assessment/feedback.
- **Job information and work metrics** such as position, title, employment contract, payroll ID, line manager, job band, performance history, employment status, leave of absence information, working time logging, training records, performance targets and development goals. In some cases, we may also record results of capability assessments, safety reports and incidents, and professional feedback.
- **Compensation, allowances, benefits and expense related information** such as salary data, payroll data, pension plan number and contributions, non-salary benefits, bonus, compensation, share options, dependents, beneficiaries or health benefit nomination, bank statements, expense claims and receipts, bank account details, credit card data, phone expenses and insurance data.
- **Electronic identification data and information (where employee has access or is affected by such systems or applications)** such as access logs, IT and internet usage, device identifiers (mobile device ID, PC ID etc.), registration and login credentials, IP address, tracking and analytics data, recordings (e.g. voice mail/call recordings), posts on corporate platforms (e.g. Yammer), password recovery data, information obtained via IT security tools.
- **Financial and other details** such as account information, credit checks, payment details and transactions, investigation information and disciplinary history.
- **Other personal data (which may include special categories of information as mentioned below)** namely where you or others (such as your colleagues) may register these data on or in our systems, programs and application such as business documents containing personal information (e.g. queries, questions, complaints, orders and related records; emails; reports; contracts; presentations, minutes; work products), photos, images and/or videos.
- The below mentioned types of personal data are only collected and processed, if at all, in accordance with applicable local laws in your country of residence.

- **Special categories of personal data** such as:
 - membership of religious congregations (e.g. if required for tax purposes);
 - health and medical information, including disability status, special working conditions (such as use of a standing desk) and medical devices needed on the premises, work related injury and illness information, data for travel emergency support (blood type, medical history, allergies);
 - race or ethnicity (e.g. where this is used for diversity purposes);
 - in some cases: trade union membership, political opinions and sex life or sexual orientation (e.g. where this is used for investigations of non-equal treatment).

- **Data about criminal convictions and offences** such as criminal background information and sanction list information to the extent required for the purposes of criminal background screening and Know Your Customer and Anti Money Laundering obligations.

- **To the extent necessary to fulfil our obligations, data obtained from publicly accessible sources or which are legitimately transmitted by other third parties (e.g. a credit agency)** such as data in public professional social media (e.g. LinkedIn), background check data.

In case you would like to be provided with information about a specific personal data processing activity, you can request that by submitting a request at contact@tacita.io

4. Why we use your personal data?

We may use your personal data as listed above for the following purposes:

- human resources management including organization and personal administration, working hours management, improving and maintaining effective staff administration, internal workforce analysis, reporting and planning;
- staff transfer management from different affiliates and succession planning;
- payroll, compensation and benefits management including providing staff benefits and maintaining salary, compensations including intellectual property, allowances, benefits, insurances, pensions and performance reviews;
- talent management and acquisition including recruitment, assessing suitability and working capacity, background checks and verification of qualifications, obtaining and providing references;
- learning and development management including certifications, training staff and performing assessments and employee satisfaction surveys;
- processes related to joining and leaving including internal moves and terminations;
- sickness and other leave and vacations management;
- internal health and safety programs including health and safety and accident records or reporting and managing process quality;
- travel and expenses management and organization of business trips including monitoring of travellers to provide support during security or medical emergencies; providing travel security, health and safety training and on a voluntary basis assistance in giving security support during emergencies;

- carrying out the obligations and exercising specific rights in the field of employment or a collective agreement;
- internal and external communication of Tacita
- 's organization and representation of Tacita including commercial register and assigning powers of attorney;
- organizing Tacita events and documentation of such events including managing and organizing internal non-marketing related campaigns, events and meetings;
- managing Tacita assets including pictures and videos depicting employees or other individuals available for download on the Tacita intranet, Tacita website, etc.;
- finance and shared accounting services providing record to report, order to cash and purchase to pay services;
- reorganization, acquisition and sale of activities, business units and companies;
- business reporting, statistics and analytics;
- monitoring and auditing compliance of employees' activities in the workplace with Tacita's corporate policies, contractual obligations and legal requirements including disciplinary actions;
- carrying out audits, reviews and regulatory checks to meet obligations to regulators;
- governance, risk and compliance, including compliance with laws, law enforcement, court and regulatory bodies' requirements (such as for the process of verifying the identity of customers, called as Know Your Customer / Anti Money Laundering monitoring purposes), customs and global trade compliance, conflict of interest and security obligations) and prevention, detection, investigation and remediation of crime and fraud or prohibited activities or to otherwise protect legal rights and to establish, exercise or defend legal claims;
- managing the customer relationship, processing customer orders and providing customer support, processing, evaluating and responding to requests and inquiries;
- managing the suppliers, contractors, advisers and other professional experts including contact interaction, processing and fulfilling purchases and invoices, and contract lifecycle management;
- making use of work performance and products and for references on documents, such as drawings, purchase orders, sales orders, invoices, reports;
- access control system providing electronically controlled ingress and/or egress for authorised individuals to locations that have access restrictions and a registry of personnel on site in case of emergencies;
- intrusion detection including 3rd party monitoring of duress, perimeter, internal security points and ancillary supervisory monitors for site maintenance/automated systems;
- maintaining and protecting the security of products, facilities, services, systems, networks, computers, and information, preventing, and detecting security threats, fraud or other criminal or malicious activities, and ensuring business continuity; and
- managing IT resources, including infrastructure management including data back-up, information systems' support and service operations for application management, end user support, testing, maintenance, security (incident response, risk, vulnerability, breach response), master data and workplace including user accounts management, software licenses assignment, security and performance testing and business continuity.

We collect only the personal data from you that we need for the purposes described above. Certain personal data collected from you relates to your next of kin and emergency contacts. In these cases, you are requested to inform such persons about this Notice.

In case you are working at a third-party site (for example Tacita customer location or facility), such third party may need to process your personal data for their purposes acting as a data controller. In these cases, you will receive or may request a separate privacy notice from the relevant data controller.

What happens if you do not provide us with the information we have requested?

Where it concerns processing operations related to your employment (as described above), Tacita will not be able to adequately employ you without certain personal data and you may not be able to exercise your employee rights if you do not provide the personal data requested. Although we cannot mandate you to share your personal data with us, please note that this then may have consequences which could affect your employment in a negative manner, such as not being able to exercise your statutory rights or even to continue your employment. Whenever you are asked to provide us with any personal data related to you, we will indicate which personal data is required, and which personal data may be provided voluntarily.

5. The legal basis we rely on

For the use of your **personal data** for the purposes described above (in section 4), we rely on the following legal basis, as applicable:

- We process your personal data for the **fulfilment of obligations in your employment contract** with us and similar collective employment agreements, or as part of pre-contractual measures to establish employment and related contracts;
- In some cases, we rely on our **legitimate interests** to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:
 - monitoring (for example through IT systems), investigating and ensuring compliance with legal, regulatory, standard and Tacita internal requirements and policies;
 - prevention of fraud and criminal activity including investigations of such activity, misuse of Tacita assets, products, and services, and as strictly necessary and proportionate for ensuring network and information security; and
 - transmitting personal data within the Tacita group for internal administrative purposes as necessary, for example to provide centralised services.
- You may obtain a copy of our assessment regarding our legitimate interest to process your personal data by submitting a request to contact@tacita.io

- In some cases, we process your personal data on the basis of **statutory requirements**, for example, on the basis of labour law, allowances, tax or reporting obligations, cooperation obligations with authorities or statutory retention periods in order to carry out our contractual responsibilities as an employer;
- In exceptional circumstances we may **ask your consent** at the time of collecting the personal data, for example photos, communications materials, and events. If we ask you for consent in order to use your personal data for a particular purpose, we will remind you that you are free to withdraw your consent at any time and we will tell you how you can do this.

Regarding special categories of personal data we will only process such data in accordance with applicable law and:

- with your explicit consent for specific activities in accordance with applicable law;
- when necessary for exercising rights based on employment, or social protection law or as authorised by collective agreement, or for preventive and occupational medicine or and evaluation of working abilities; or
- where necessary for establishment, exercise, and defence of legal claims.

Regarding personal data concerning criminal convictions and offences, we will only process such data where such processing is permitted by applicable (local) law.

Transfers of your personal data

We may transfer your personal data to third-party, cloud based, storage systems and financial management systems. This allows us to manage file sharing and our finances more efficiently. Tacita will ensure that your personal data is hosted in UK and/or EU servers. Tacita will also ensure that contracts with these third-parties meet all UK-GDPR requirements.

CONTRACTORS OR POTENTIAL CONTRACTORS OR WORKERS WORKING UNDER A SERVICE CONTRACT

The types of information we collect and use

We collect and use personal data that concerns you in connection with your work assignment and the services you are providing under the work assignment/statement of work directly to Tacita. We may collect the following categories of personal data:

- **Identification data and business contact information, you share with us** such as first name, last name, job/position/title, employer, employer address, nationality, tax number, work permit/visa information, business email address, business address, telephone number, mobile telephone number, telefax number, private telephone number, private email address, gender, date of birth.

- **Additional information you provide to us in the course of your work assignment** such as data concerning the fulfilment of your work assignment, our contractual obligations and pre-contractual measures including correspondence data, offers, tenders, resume/CV, background check data, conditions, qualifications/certificates, contract and order data, invoices, payments, business partner history, records relating to queries/questions/complaints/orders, working time logging, and training and education records, vehicle license plate, insurance data.
- **Expense related information** such as bank statements, payment details, transactions, expense claims and receipts, bank account details, credit card data.
- **Electronic identification data and information collected by the communications systems, IT applications and website browser (where contractor has access or is affected by such systems or applications and in accordance with the applicable law)** such as information technology usage (system access, IT and internet usage), device identifier (mobile device ID, PC ID), registration and login credentials, IP address, login data and log files, Analytics ID, digital alias/signature, time and URL, searches, website registration and cookie data recordings (e.g. voice mail/phone recordings, Skype recordings).
- **Other personal data** namely where you or others (such as your colleagues) may register these data on or in our systems, programs and application such as business documents containing personal information (e.g. queries, questions, complaints, orders and related records, emails, reports, contracts, presentations, minutes, work products),
- photos, images and/or videos.

The below mentioned types of personal data are only collected and processed, if at all, in accordance with applicable local laws in your country of residence and where relevant depending on your work assignment.

- **Special categories of personal data** such as data for travel emergency support (blood type, medical history, allergies).
- **Data about criminal convictions and offences** such as criminal background information for the purposes of criminal background screening.
- **To the extent necessary to fulfil our obligations, data obtained from publicly accessible sources or which are legitimately transmitted by other third parties (e.g. a credit agency)** such as data transferred to Tacita by your employer or the company through which you are assigned to Tacita, commercial register data, creditworthiness data.

In case you would like to be provided with information about a specific personal data processing activity, you can request that by submitting a request at contact@tacita.io

Why we use your personal data?

We may use your personal data as described above for the following purposes:

- human resources management as relevant to your work assignment and the services you are providing under the work assignment/statement of work directly to Tacita including organization and personal administration, working hours management,

improving and maintaining effective staff administration, internal workforce analysis, reporting and planning;

- supplier and service provider management throughout the procurement, logistics and supply chain including contact interaction including tendering, engagement, processing orders, process and fulfilment of purchases, administration and management of suppliers, vendors, contractors, advisers and other professional experts including contact interaction, processing and fulfilling purchases and invoices, and contract lifecycle management;
- staff transfer management from different affiliates and succession planning;
- training contractors;
- internal health and safety programs;
- travel and expenses management and organization of business trips including monitoring of travelers to provide support during security or medical emergencies, providing travel security, health and safety training and on a voluntary basis assistance in giving security support during emergencies, insurance management;
- finance and shared accounting services providing record to report, order to cash and purchase to pay services;
- making use of work performance and products and for references on documents, such as drawings, purchase orders, sales orders, invoices, reports;
- reorganization, acquisition and sale of activities, business units and companies;
- monitoring and auditing compliance with Tacita's corporate policies, contractual obligations and legal requirements;
- carrying out audits, reviews and regulatory checks to meet obligations to regulators;
- maintaining and protecting the security of products, facilities, services, systems, networks, computers and information, preventing and detecting security threats, fraud or other criminal or malicious activities, and ensuring business continuity; and
- managing IT resources, including infrastructure management including data back-up, information systems' support and service operations for application management, end user support, testing, maintenance, security (incident response, risk, vulnerability, breach response), master data and workplace including user accounts management, software licenses assignment, security and performance testing and business continuity.

We collect only the personal data from you that we need for the purposes described above. For statistical purposes, improvement of our services and testing of our IT systems we only use anonymised data. This means that these data can no longer (in)directly identify you or single you out as an individual.

What happens if you do not provide us with the information we had asked you for or if you ask us to stop processing your information?

Where it concerns processing operations related to your work assignment (as described above), Tacita will not be able to adequately establish, conduct or terminate a business relationship with you, your employer or the company through which you are assigned to Tacita and generally perform the purposes described above without certain personal data. Although we cannot obligate you to share your personal data with us, please note that this then may have consequences which could affect your work assignment in a negative

manner, such as not being able to take requested pre-contractual measures to enter into a contract with you, your employer or the company through which you are assigned to Tacita or to establish and continue your work assignment.

The legal basis we rely on

We use your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

- We may process your personal data for the **fulfilment of contractual obligations resulting from your work assignment**, or as part of pre-contractual measures we take;
- In some cases, we rely on our **legitimate interests** to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:
 - conduct, management, development and furtherance of our business in the broadest sense possible including supply of products and services, performance of agreements and order management with suppliers, process and fulfilment of purchases, process quality management and improvement of products or services, analytics and market intelligence, reduction of default risks in our procurement processes and reorganization, acquisition and sale of activities, business divisions and companies;
 - monitor, investigate and ensure compliance with legal, regulatory, standard and Tacita internal requirements and policies;
 - prevent fraud and criminal activity including investigations of such activity, misuse of Tacita assets, products and services, and as strictly necessary and proportionate for ensuring network and information security; and
 - transmitting personal data within the Tacita group for internal administrative purposes as necessary for example to provide centralised services.

You may obtain a copy of our assessment of why we may process your personal data for these interests by submitting a request at contact@tacita.io

- In some cases, we process your personal data on the basis of legal obligations and statutory requirements, for example, on the basis of tax or reporting obligations, cooperation obligations with authorities, statutory retention periods or the disclosure of personal data within the scope of official or judicial measures may be required for the purposes of taking evidence, prosecution or enforcement of civil law claims.

With regard to special categories of personal data we will only process such data in accordance with applicable law and:

- We will ask your explicit consent for specific activities in accordance with applicable law; or
- where necessary for establishment, exercise and defence of legal claims.

With regard to personal data concerning criminal convictions and offences, we will only process such data where such processing is permitted by applicable (local) law.

Transfers of your personal data

We may transfer your personal data to third-party, cloud based, storage systems and financial management systems. This allows us to manage file sharing and our finances more efficiently. Tacita will ensure that your personal data is hosted in UK and/or EU servers. Tacita will also ensure that contracts with these third-parties meet all UK-GDPR requirements.

SUPPLIERS OR POTENTIAL SUPPLIERS

The personal data we collect about you and how we use it

We collect and use personal data that concerns you in connection with the agreements with our suppliers. We may collect the following categories of personal data:

- **Identification data and business contact information, you share with us** such as first name, last name, job/position/title, nationality, business email address, business address, telephone number, mobile telephone number, telefax number, private telephone number, gender, date of birth.
- **Additional information you provide to us in the course of our business relations** such as data concerning the fulfilment of our contractual obligations and pre-contractual measures including correspondence data, offers, tenders, resume/CV, conditions, contract and order data, invoices, payments, business partner history, records relating to queries/questions/complaints/orders.
- **Electronic identification data and information collected by the communications systems, IT applications and website browser (where supplier has access or is affected by such systems or applications and in accordance with the applicable law)** such as information technology usage (system access, IT and internet usage), device identifier (mobile device ID, PC ID), registration and login credentials, IP address, login data and log files, Analytics ID, time and URL, searches, website registration and cookie data, sound recordings (e.g. voice mail/phone recordings, Skype recordings).

The below mentioned types of personal data are only collected and processed, if at all, in accordance with applicable local laws in your country of residence and where relevant depending on the agreements with our suppliers.

- **Data about criminal convictions and offences** such as criminal background information and sanction list information to the extent required for the purposes of criminal background screening, due diligence and Anti Money Laundering obligations
- **To the extent necessary to fulfil our obligations**, data obtained from publicly accessible sources or which are legitimately transmitted by other third parties (e.g. a credit agency) such as commercial register data, creditworthiness data.

What we use your personal data for

We may use your personal data as described above for the following purposes:

- supplier and service provider management throughout the supply chain including contact interaction including tendering, engagement, processing orders, process and fulfilment of purchases, administration and management of suppliers, vendors, contractors, advisers and other professional experts;
- paying debts, supplier invoice and payment management, purchasing of direct and indirect services;
- reporting and analytics including market intelligence and development and improvement of services or products through assessment and analysis of the information;
- management of process quality;
- references on documents, such as tenders, purchase orders, invoices, reports;
- contract lifecycle management;
- payment collection and insolvency processes;
- training suppliers;
- finance and shared accounting services, providing record to report and purchase to pay services;
- reorganisation, acquisition and sale of activities, business units and companies;
- monitoring and auditing compliance with Tacita's corporate policies, contractual obligations and legal requirements;
- carrying out audits, reviews and regulatory checks to meet obligations to regulators;
- governance, risk and compliance, including due diligence and anti-money laundering obligations, customs and global trade compliance and sanctioned party list screening, security, including prevention, detection of crime and fraud;
- maintain and protect the security of products, facilities, services, systems, networks, computers and information, preventing and detecting security threats, and fraud or other criminal or malicious activities; and
- manage IT resources, including infrastructure management including data back-up, information systems' support and service operations for application management, end user support, testing, maintenance, security (incident response, risk, vulnerability, breach response), user accounts management, software licenses assignment, security and performance testing and business continuity.

We collect only the personal data from you that we need for the purposes described above. For statistical purposes, improvement of our services and testing of our IT systems we use as much as reasonably possible anonymised data. This means that these data can no longer (in)directly identify you or single you out as an individual.

What happens if you do not provide us with the information we had asked you for or if you ask us to stop processing your information?

Where it concerns processing operations related to the agreements with our suppliers (as described above), Tacita will not be able to adequately establish, conduct or terminate a business relationship with you or your company and generally perform the purposes

described above without certain personal data. Although we cannot obligate you to share your personal data with us, please note that this then may have consequences which could affect the business relationship in a negative manner, such as not being able to take requested pre-contractual measures to enter into a contract with you or to establish and continue the business relationship you have asked for.

The legal basis on which we use your personal data

We use your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

We may process your personal data for the **fulfilment of contractual obligations resulting from contracts with you or your company**, or as part of pre-contractual measures we take;

In some cases, we rely on our **legitimate interests** to process your personal data insofar as this is not overridden by your own privacy interests. Such interests may include:

- conduct, management, development and furtherance of our business in the broadest sense possible including supply of products and services, performance of agreements and order management with suppliers, process and fulfilment of purchases, process quality management and improvement of products or services, analytics and market intelligence, reduction of default risks in our procurement processes and reorganization, acquisition and sale of activities, business divisions and companies;
- monitor, investigate and ensure compliance with legal, regulatory, standard and Tacita internal requirements and policies;
- prevent fraud and criminal activity including investigations of such activity, misuse of Tacita assets, products and services, and as strictly necessary and proportionate for ensuring network and information security; and
- transmitting personal data within the Tacita group for internal administrative purposes as necessary for example to provide centralised services.

In some cases, we process your personal data on the basis of legal obligations and statutory requirements, for example, on the basis of tax or reporting obligations, cooperation obligations with authorities, statutory retention periods or the disclosure of personal data within the scope of official or judicial measures may be required for the purposes of taking evidence, prosecution or enforcement of civil law claims.

Regarding personal data concerning criminal convictions and offences, we will only process such data where such processing is permitted by applicable (local) law.

CUSTOMERS/CLIENTS OR POTENTIAL CUSTOMERS/CLIENTS

The personal data we collect about you and how we use it

We collect the following categories of personal data:

- **The business contact information you share with us:** name, title, job title, email address, business address, telephone number, mobile telephone number
- **Additional information you provide to us in the course of our business relations, such as:** interests in Tacita services or products, marketing preferences, registration information provided at events, fairs, contract or order data, invoices, payments, business partner history, etc.
- **Information your browser makes available when you visit the Tacita website:** IP address, the source of your site visit, time spent on the website or a particular page, links clicked, comments shared, browser type, date and time of visit, etc.
- **To the extent necessary to fulfil our obligations, data obtained from publicly accessible sources or which are legitimately transmitted by other third parties (e.g. a credit agency):** commercial register data, association register data, creditworthiness data.

What we use your personal data for

We use your personal data to:

- process and fulfil orders and keep you informed about the status of your or your company's order;
- provide and administer our products and services;
- provide customer support and process, evaluate and respond to requests and inquiries;
- conduct and facilitate customer satisfaction surveys;
- conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- send you marketing communications (such as alerts, promotional materials, newsletters, etc.);
- perform data analytics (such as market research, trend analysis, financial analysis, and customer segmentation).

We only collect the personal data from you that we need for the above purposes. We may also anonymise your personal data, so it no longer identifies you and use it for various purposes, including the improvement of our services and testing our IT systems.

What happens if you do not provide us with the information we had asked you for, or if you ask us to stop processing your information?

Certain personal data is necessary to establish, conduct or terminate a business relationship with you. We need you to provide us with the personal data required for the fulfilment of contractual obligations or which we are legally obliged to collect. Without such personal

data, we will not be able to establish, execute or terminate a contract with you. Also, we will be unable to take requested pre-contractual measures to enter a contract with you or to establish and continue the business relationship you have asked for.

The legal basis on which we use your personal data

We use your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

- We may process your personal data for the fulfilment of contractual obligations resulting from contracts with you or your company, or as part of pre-contractual measures we have been asked to take;
- We may process your personal data on the basis of statutory requirements, for example, on the basis of tax or reporting obligations, cooperation obligations with authorities or statutory retention periods;
- We will ask your consent for the activities described in this privacy notice when required by applicable law, for example when we process your data for marketing purposes where we don't have an existing business relationship with you or your company; or
- We will rely on our legitimate interests to process your personal data within the scope of the business relationship with you or your company. Our legitimate interests to collect and use the personal data for this purpose are management and furtherance of our business. You may obtain a copy of our assessment of why we may process your personal data for these interests by submitting a request at contact@tacita.io

Transfers of your personal data

We may transfer your personal data to third-party, cloud based, customer relationship management (CRM) systems. This allows us to manage sales and marketing communication more efficiently with you. Tacita will ensure that your personal data is hosted in UK and/or EU servers. Tacita will also ensure that contracts with these third-parties meet all UK-GDPR requirements.

OTHER DATA SUBJECT TYPES

Unsolicited Personal Information

If you send Tacita unsolicited personal information, for example a CV, Tacita reserves the right to immediately delete that information without informing you or to decide which category of data subject that you appear to be and manage your personal data within the remit of that category as described elsewhere in this Privacy Notice.

Users of our website that do not fall under the specifically stated Data Subject Types

The personal data we collect about you and how we get it

We collect the following categories of personal data:

- **The business contact information you share with us:** name, title, job title, email address, business address, telephone number, mobile telephone number, etc.

- **Information your browser makes available when you visit the Tacita website:** IP address, the source of your site visit, time spent on the website or a particular page, links clicked, comments shared, browser type, date and time of visit, etc.

What we use your personal data for

We use your personal data to:

- respond to your specific request that you make, for example request a demonstration, whitepapers, newsletters, or other information.
- provide customer support and process, evaluate and respond to requests and inquiries;
- conduct and facilitate customer satisfaction surveys;
- conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- send you marketing communications (such as alerts, promotional materials, newsletters, etc.);
- perform data analytics (such as market research, trend analysis, financial analysis, and customer segmentation).

We only collect the personal data from you that we need for the above purposes. We may also anonymise your personal data, so it no longer identifies you and use it for various purposes, including the improvement of our services and testing our IT systems.

The legal basis on which we use your personal data

We use your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

- Legitimate interest as by using our website it is understood that there is potential for you to be a potential customer, contractor, employee, or supplier.