



**VERSION 1**

**Privacy Policy**

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## 1. DOCUMENT CONTROL

Document Title: Privacy Policy

Procedure Owner: Data Protection Officer

### 1.1. Version control

Version control is managed and tracked within the Version 1 process and policy library.

### 1.2. Document classification

The information is of a public nature and not confidential.

## 2. POLICY OVERVIEW

### 2.1 Description

This Privacy Policy reflects how Version 1 Holdings Limited and/or its affiliates ("Version1"; "we") protect the personal data we process and control in relation to you and the rights which you have in the regards to the processing of your personal data.

This policy describes Version 1 practices in connection with information that we collect through activities that link to this Privacy Policy through the services that we may offer, that we control, as well as through messages that we send to you (including the Social Media Pages, Application and Websites, etc.). By providing Personal Information to us, you agree to the terms and conditions of this Privacy Policy.

## 3. DATA PROTECTION POLICY

All processing of personal data must be conducted in accordance with the data protection principles set out in relevant legislation. Our policies and procedures are designed to ensure compliance with the following principles:

- Personal data shall be processed **lawfully, fairly and in a transparent manner** in relation to the data subject ('lawfulness, fairness and transparency')
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Personal data shall be **adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed ('data minimisation')
- Personal data shall be **accurate and, where necessary, kept up to date**; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- Personal data shall be kept in a form which **permits identification of data subjects for no longer than is necessary** for the purposes for which the personal data are processed
- Personal data shall be processed in a manner that ensures **appropriate security of the personal data**, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

## 4. PERSONAL DATA

Version 1 attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that when you deal with Version 1, your personal data is in good hands.

Version 1 protects your personal data in accordance with applicable laws and our data privacy policies. In addition, Version 1 maintains the appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage.

### 4.1 Categories of personal data we collect

We collect personal data of our employees, potential employees, clients, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how they will be used.

Except for certain information that is required by law, or as part of the services we provide, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data. However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems which require the use of such personal data.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with Version 1.

The above-mentioned categories of personal data have been obtained either directly from you (for example, when you provide information to sign up for a newsletter or apply for a role within Version 1) or indirectly from certain third parties (for example, through our website's technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers and vendors.

### 4.2 Purposes for processing your personal data

Version 1 uses your personal data only where required for specific purposes. The below lists the purposes for which Version 1 uses your personal data and an overview of the legal basis for each such purpose.

Purpose	Legal basis
Managing our contractual and/or employment relationship with you	Necessary for the performance of a contract to which you are a party.
Recruitment	Necessary for our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you	Necessary for our legitimate interests for ensuring proper communication and emergency handling within the organisation.
Operating and managing our business operations	Necessary for our legitimate interests for ensuring the proper functioning of our business operations.
Complying with legal requirements	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems	Necessary for our legitimate interests of avoiding noncompliance and protecting our reputation.
Improving the security and functioning of our website, networks and information	Necessary for our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Marketing our products and services to you.	Necessary for our legitimate interests for ensuring that we can conduct and increase our business.
Creating marketing material for or of Version 1 events.	Necessary for our legitimate interests for ensuring that we can conduct and increase our business.

Version 1 will process your personal data for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws. We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorised by law.

### 4.3 Your personal data and third parties

We may transfer personal data to our service providers, professional advisors, public and governmental authorities or third parties in connection with a (potential) corporate or commercial transaction. Information may also be processed by third parties as part of day to day business activities, such as payroll, travelling partners, company health insurance and pension enrolment. Such third parties may be located in other countries, in such events Version 1 we shall take the necessary steps to ensure that your personal data will be given



adequate protection as required by relevant data privacy laws and Version 1's internal policies.

Unless you are otherwise notified, any transfers of your personal data from within the European Economic Area (EEA) to third parties outside the EEA will be based on an adequacy decision or are governed by the standard contractual clauses. Any other non-EEA related transfers of your personal data will take place in accordance with the appropriate international data transfer mechanisms and standards.

#### **4.4 Processing of sensitive data**

While Version 1 do not seek to collect sensitive data (also known as special categories) through our sites. In the event where we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term "sensitive data" refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

#### **4.5 Data security measures**

Version 1 maintain organisational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

Version 1 holds an active ISO27001 certification, which indicates that we adhere to the highest and strictest information security standards. This certification is an international recognised standard and defines the requirements for an Information Security Management System, and confirms that Version 1's processes and security controls provide an effective framework for protecting our clients' and our own information.

#### **4.6 Personal data transfers**

Personal data we collect may be transferred or be accessible internationally throughout Version 1's business and between its entities and affiliates. Any such transfers that take place will be done in accordance with the applicable data privacy laws.

Version 1 is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA or other countries deemed adequate by the EU.

Where we authorise the processing or transfer of your personal information outside of the approved countries, we require your personal information to be protected and include the following data protection transfer mechanisms:

Model Clauses: These are standard clauses in our contracts with our service providers to ensure that any personal data leaving the EEA or other countries deemed adequate by the EU will be transferred in compliance with EU data-protection law.

#### **4.7 How long will your personal data be retained by us?**

Version 1 will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time. We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

#### **4.8 Your rights with respect to the processing of your personal data**

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Version 1 no longer processes your personal data.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes it was collected for.
- Request the restriction of the processing of your personal data: this right entitles you to request that Version 1 only processes your personal data in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to Version 1, or request Version 1 to transmit such personal data to another data controller.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by submitting a formal request to Version 1. Please note that this will not affect Version 1's right to process personal data to continue parts of the processing based on other legal bases than your consent, such as the delivery of contracted services.

## **5. PERSONAL DATA WHEN YOU VISIT VERSION 1'S WEBSITE**



We may collect and process the following personal data:

- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services, newsletters and alerts, registering for a conference or requesting a white paper or further information. Pages that collect this type of personal data may provide further information as to why your personal data are needed and how it will be used. It is completely up to you whether you want to provide it.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Any postings, comments or other content that you upload or post to a Version 1 site (such as Facebook, Twitter, LinkedIn etc).
- Our website collects personal data about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data.

## 5.1 Links to websites and programs of third parties

Our websites may include:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and privacy statements before using and providing any information to such third parties' sites and programs.

## 5.2 How do we use personal data that we collect from our websites?

We use personal data for the purposes described in the section "Purposes for processing your personal data?" above, as well as to provide you with information you request, process online job applications, and for other purposes which we would describe to you at the point where it is collected. For example:

- To fulfil your requests for white papers, articles, newsletters or other content.
- For surveys or research questionnaires.
- To personalise your experience at our website.

- To contact you for marketing purposes where you have agreed to this.
- When applying for a role within Version 1

## 6. PERSONAL DATA FOR MARKETING PURPOSES

### 6.1 Sources of our marketing data

The bulk of the personal data we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company.

### 6.2 Marketing e-mails

We send commercial e-mail to individuals at our client or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our targeted e-mail messages typically include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in a marketing e-mail you receive from Version 1, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Targeted e-mails from Version 1 may include additional data privacy information, as required by applicable laws.

Additional details regarding our cookie policy can be found at:

<https://www.version1.com/cookie-policy/>

### 6.3 Customer Relationship Management (CRM) databases

Our CRM databases include personal data belonging to individuals at our client and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information, such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted e-mail (including web activity following links from our e-mails), website activity of registered users of our website, and other business information included by Version 1 professionals based on their personal interactions with you.

## 6.4 Combining and analysing data

We may combine data from publicly available sources, and from our different e-mail, website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our sites or connect to our sites using your social media credentials (such as LinkedIn and Facebook). We combine this data to better assess your experience with Version 1 and to perform the other activities described throughout our privacy policy.

## 6.5 Version 1 Events

When attending a Version 1 event, photographs and/or videos of me may be taken during the course of the event. Version 1 may use photographs and/or video recordings from events both internally and externally to promote the event or Version 1. These images could be used in print and digital media formats including print publications, websites, e-marketing, advertising and social media. These images may be viewed throughout the world and not just within the EEA.

Version 1 is committed to processing information in accordance with the General Data Protection Regulation (GDPR). The personal data collected at the event will be held securely and will only be used for purposes outlined.

## 6.6 Your rights regarding marketing communications

You can exercise your right to prevent marketing communications to you by checking certain boxes on the forms we use to collect your personal data, or by utilising opt-out mechanisms in e-mails we send to you. You can also exercise the right to discontinue marketing communications to you, or to have your personal data removed from our marketing databases at any time by contacting us. In such cases, we will retain minimum personal data to note that you opted out in order to avoid contacting you again.

## 7. COMPLIANCE

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## 8. CHANGES TO THIS POLICY

We may change this Privacy Policy. Any changes to this Privacy Policy will become effective when the Privacy Policy is published.

## 9. CONTACT US

### **Please contact us:**

- If you have a general question about how Version 1 protects your personal data.
- If you wish to exercise your rights in relation to your personal data rights
- If you wish to make a complaint about Version 1's use of your data.
- If you have any questions about this Privacy Policy, please contact us as follows:

### **Phone Number:**

+ 353 1 865 7800,

+ 44 203 135 6030

You can also contact our Data Protection Officer at [dpo@version1.com](mailto:dpo@version1.com)

Additional contact details can be found on our website [www.version1.com](http://www.version1.com)

You have the right to complain to the Data Protection Commission or another supervisory authority.

You can contact the Office of the Data Protection Commissioner at:

<https://www.dataprotection.ie/docs/Contact-us/b/11.html>



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