



DATA PROTECTION POLICY

The NAVAX Group
hereinafter referred to as “NAVAX”

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1. Scope

This Policy applies for all NAVAX Group companies. At present, these are

- ▶ NAVAX Consulting GmbH (company reg. no. 352812 t)
- ▶ NAVAX Projekt GmbH (company reg. no. 314705 b)
- ▶ 4relation Consulting GmbH (company reg. no. 276249 z)
- ▶ NAVAX Productivity Consulting GmbH (company reg. no. 386147 p)
- ▶ NAVAX GmbH (Germany) (company reg. no. 77844)
- ▶ NAVAX Online GmbH (company reg. no. 437520 m)

Other companies will be added to this Policy by side letter if necessary.

2. Purpose of data processing

NAVAX processes personal data of employees, partners, customers and suppliers for the purpose of carrying on its business and complying with associated statutory and contractual obligations.

2.1 Processing of customer data

NAVAX stores and processes personal data provided by customers and prospective customers in order to prepare quotations and offers, fulfil assignments and orders and comply with associated contractual and legal obligations. Data is also transmitted to public authorities or bodies for the purpose of compliance with legal obligations.

2.2 Job applicants

Contact information and application documents submitted by job applicants are processed electronically for the purpose of selecting suitable candidates for employment.

If your application is unsuccessful, we will retain your application documents only with your consent.

2.3 Website and cookies

2.3.1 IP address

When you visit our website, information is automatically stored by the web server. This includes information on the browser and operating system you are using, the website that brought you to our website, your IP address, the time of your visit and other information. The data visible to NAVAX is pseudonymized and cannot be used to identify any individual without additional data sources.

NAVAX will not analyze this data except in the case of unlawful use of the website.

2.3.2 Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Analytics uses cookies, i.e. text files which are placed on your computer to help analyze how you use the site. The information generated by the cookie about your use of the website will normally be transmitted to and stored by Google on a server in the United States.

Google Analytics anonymizes the IP addresses of visitors to this website. This means that your IP address will be truncated, so making it anonymous. This truncation and anonymization is carried out within member states of the European Union or in countries which are signatories to the Agreement on the European Economic Area. Only in exceptional cases will your full IP address be transmitted to a Google server in the USA and truncated there. Google will use this information to analyze your use of this website to compile reports on website activity for the website operator and to provide other services related to website and internet use for the website operator.

The IP address sent by your browser for Google Analytics will not be linked with any other data held by Google. You may refuse cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of this website. Moreover, you can prevent Google from recording data generated by the cookie about your use of the website and processing the anonymized data (incl. your IP address) by downloading and installing the browser add-on available from <https://tools.google.com/dlpage/gaoptout?hl=en>.

Social media plugins

Our website uses social media plugins. These plugins are not enabled until visitors to the website click on them. No personal data is collected or transmitted if you use of these buttons.

2.4 Newsletter

We use the name and email address you provide when you subscribe to our newsletter to bring you regular news about the company and keep you up to date on our latest offers.

If you no longer wish to receive the newsletter, you can unsubscribe at any time. You can do this by clicking on the unsubscribe link included in every email.

3. Principles of processing of personal data

The processing of personal data is governed by strict principles which accord the highest priority to data protection and data security and the rights of data subjects.

3.1 Lawfulness and transparency

Data processing is carried out lawfully and fairly. Data subjects are informed of the intended processing and how their data will be handled when the data is collected. Data subjects are informed of the following as a minimum:

- ▶ Controller responsible for the data processing
- ▶ Purpose of the processing
- ▶ Legal basis of processing

3.2 Use of data only for designated purpose

The data is collected and processed for specified, explicit and legitimate purposes. It is not processed in a manner that is incompatible with those purposes.

3.3 Data minimization

Only data which is essential for the specified purpose is collected and processed. If possible in view of the purpose of the processing and if achievable at reasonable effort, only anonymized data is processed.

3.4 Storage limitation and erasure

Personal data is erased as soon as it is no longer needed for the purpose for which it was originally collected and statutory retention periods preventing its erasure no longer apply.

If in individual cases there are legitimate interests in this data, the data will be retained until legal clarification of the legitimate interest has been obtained.

3.5 Data security

Personal data is subject to confidentiality rules. Those handling this data are required to treat it as confidential, and organizational and technical measures are in place to protect it against unauthorized access, unlawful modification or disclosure, and loss or destruction.

3.6 Accuracy

Personal data must be kept accurate, complete and up to date. Suitable measures are taken to ensure that information which is out of date, incorrect or incomplete is rectified.

4. Confidentiality obligation

All employees of NAVAX and its Group companies are bound by a confidentiality agreement and receive regular reminders and training on secure handling of personal and other critical data.

5. Data security

NAVAX is committed to ensuring the confidentiality, availability and integrity of data. This applies equally to trade secrets, customer data, personal data and other critical information.

For this purpose, state of the art technical and organizational security measures and internationally recognized best practices and security standards are applied and continuously improved.

6. Data protection officer

NAVAX is not required to appoint a data protection officer because Article 37(1) of the GDPR does not apply to it.

However, because data protection is a priority within the NAVAX Group, a central contact point has been established internally. It is available to respond to inquiries and provide information to data subjects at any time.

You can contact this central point of contact at the following email address: datenschutz@NAVAX.com

7. Rights of data subjects

Every data subject whose personal data is processed by NAVAX can invoke and exercise their rights as a data subject at any time by contacting NAVAX's central contact point.

To exercise your data subject rights, you can contact NAVAX by email at datenschutz@NAVAX.com at any time.

7.1 Right of access

Data subjects have the right to receive information regarding what personal data concerning them are being processed and the purposes of the processing.

7.2 Rectification

Data subjects have the right to have inaccurate personal data concerning them rectified without undue delay.

7.3 Restriction of processing

Data subjects have the right to have processing of their personal data restricted if the accuracy of the personal data is contested, the processing is unlawful, the personal data is no longer needed for the purposes of the processing, or if the data subject has objected to processing.

7.4 Right to object and withdraw consent

Data subjects have the right to object to processing of personal data concerning them at any time.

7.5 Portability

Data subjects have the right to receive the personal data concerning them which they have provided to NAVAX, in a structured, commonly used and machine-readable format. They also have the right to transmit that data to another controller where technically feasible.

Portability applies only for personal data which is processed by automated means.

7.6 Erasure – right to be forgotten

The data subject has the right to require personal data concerning him or her to be erased without undue delay if there is no legal basis for processing of the data or a previous legal basis no longer applies, the data subject objects to the processing, or the processing is unlawful, and no statutory retention periods preclude erasure.

Data security is very important in relation to data subject rights, which is why data subjects can only exercise their rights if their identity is proven beyond doubt.

You also have the right to lodge a complaint with the data protection authority.

8. Data transfer

Personal data is transmitted to recipients outside the Group or in other EU member states in compliance with applicable law and on a lawful basis and in accordance with the highest standards of confidentiality and data security.

NAVAX processes personal data using various processors. All processors have entered into a processing agreement obliging them to comply with applicable data protection law.

9. Continuous monitoring and improvement

NAVAX is committed to continuous quality and process improvement.

To ensure optimum data protection processes, compliance with data protection guidelines and applicable legislation and the effectiveness of data protection and data security measures are continuously measured and improved.