

PRIVACY NOTICE

1. INTRODUCTION

- 1.1. This Privacy Notice describes how AFS IT Services Estonia OÜ (Estonian registry code 14530871; address Telliskivi 60/2, Tallinn 10412, Estonia; hereinafter referred to as the “**Controller**” or “**we**”) processes your personal data when you visit our website at <https://itarvato.com/> or our physical premises.
- 1.2. Personal data are any information relating to an identified or identifiable natural person (data subject), irrespective of the form of the personal data. We value your privacy and process your personal data in accordance with the applicable legislation concerning the protection of personal data, including the Regulation (EU) 2016/679 (the **GDPR**) and the Personal Data Protection Act (hereinafter referred to as the “applicable data protection law”). We implement appropriate organisational, IT-related and other necessary security measures to ensure the security of your personal data.
- 1.3. Please note that if you are visiting us as a prospective employee, the processing of your personal data is also described in our Candidate Privacy Notice, which is made available to you when you apply.
- 1.4. If you have any questions regarding this Privacy Notice or the processing of your personal data, please do not hesitate to contact us. We have appointed a data protection coordinator, whom you contact by e-mail at afs-ee.dpc@arvato.com.

2. WHICH DATA DO WE COLLECT AND WHY DO WE COLLECT THEM?

2.1. Data about your use of our website (Cookies)

- 2.1.1. When you visit our website at <https://itarvato.com/>, we may collect and process personal data that we collect or generate automatically about you and your visit, including the internet protocol (IP) address, your browser type and version, your use of our website (pages that you have viewed), and information about your device.
- 2.1.2. Cookies are placed on your device only if you provide your consent (Article 6(1)(a) of the GDPR), unless cookies are required for strictly technical functioning of the website. However, note that if you do not consent to the use of cookies, certain functions of the website may not function properly or may not function at all.
- 2.1.3. We use third party tools to collect and analyse the use of our website – Google Analytics services. These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. The information collected by these cookies is aggregated. The Google Analytics cookies normally expire within 2 years, but you can easily control and/or delete your cookies as you wish through your browser settings.
- 2.1.4. We also use some strictly necessary cookies which are necessary for our website to function and which cannot be switched off. These cookies do not store any personally identifiable information.

2.2. Personal data that we process when you visit our premises

- 2.2.1. When you visit our premises in Tallinn, Estonia, we may collect and process the following data:
- (a) personal data that we collect to register all our visitors, including your name, time of arrival and departure, the purpose of your visit and your signature;
 - (b) audio-visual recordings of visitors that we collect to carry out video surveillance in areas that are marked with video surveillance signs;
 - (c) other personal data that you may provide to us prior to and during your visit (e.g. by corresponding with us).
- 2.2.2. The purpose of keeping a log of our visitors and for using surveillance cameras is to protect the persons and property on our premises. In the event of any incidents, we may also use the records to identify persons responsible for the incidents. The legal basis for these processing activities is our legitimate interest (Article 6(1)(f) to safeguard our assets, business secrets and security, as well as the legitimate interests of third parties (e.g. the employees).
- 2.2.3. When you provide us with other personal data during your visit, we may process these data for different purposes and different legal bases depending on the nature of the data and the purpose for disclosing them. We will inform you beforehand and will explain what we intend to do with your personal data.

2.3. Your inquiries and requests

- 2.3.1. When you visit our website at <https://itarvato.com/>, we may collect and process personal data that you provide by filling in forms on our website (including your name, e-mail address, phone number, message contents).
- 2.3.2. We process these data for the purposes of answering your inquiries, handling your feedback and fulfilling your requests. The legal basis for processing your data is our legitimate interest (Article 6(1)(f) of the GDPR) to communicate with you and to provide you with a good customer experience. If you use the form on our website to apply as a candidate, the legal basis for processing your data may also be the taking of steps at your request prior to entering into a contract (Art 6(1)(b) of the GDPR).

3. RECIPIENTS OF YOUR PERSONAL DATA

- 3.1. Only a limited number of our employees will have access to your personal data. The access to your data is given only on a 'need-to-know' basis.
- 3.2. We may share your personal data with our trusted services providers and Bertelsmann group companies when they provide services to us or to you on behalf of us and under our instructions. We will control and shall remain responsible for the use of your personal data at all times.
- 3.3. Statistical browsing data may be accessible to our service providers like Google who provide us with tools for analytics.
- 3.4. Your data may in some cases be shared with external advisors and audit firms, if we are obligated under law to share information or in order to manage and defend legal claims.

- 3.5. Your personal data may be disclosed to public authorities if we are required to disclose personal data by law or comply with a lawful request of authorities.

4. TRANSFERS OF YOUR PERSONAL DATA TO THIRD COUNTRIES

- 4.1. We always strive to store and process personal data within European Economic Area (EEA, i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein). We transfer personal data outside of the EEA only where it is compliant with the applicable data protection legislation and the means of transfer provide adequate safeguards in relation to your data.

5. RETENTION OF YOUR PERSONAL DATA

- 5.1. We only retain your personal data until the purposes described in section 2 have been fulfilled or according to the statutory retention periods.
- 5.2. Cookies are usually valid for up to 2 years. You may delete them any time. Data that we have collected via Google Analytics is automatically deleted after 26 months after the last visit.
- 5.3. When you communicate with us through our website or visit our premises, we normally only keep your data for up to a year, but depending on the type of communication, we may be required to retain the communication for a longer period if this is required to fulfil the purpose of processing.
- 5.4. The data recorded by the surveillance cameras are stored for up to 90 days.
- 5.5. In some cases, personal data may be stored for a longer period if storage of personal data is required in order to protect our or any third parties' legitimate interests, e.g. in case of a legal dispute.

6. YOUR RIGHTS AS A DATA SUBJECT

- 6.1. You as the data subject have the following rights, taking into account the statutory restrictions from applicable data protection law upon exercising these rights:
- 6.1.1. right to access the personal data processed about you;
 - 6.1.2. right to the rectification of your personal data in case the data are incorrect;
 - 6.1.3. right to demand the erasure of personal data except when the we can lawfully refuse such a request;
 - 6.1.4. right to demand the restriction of personal data processing;
 - 6.1.5. right to object to the processing of your personal data;
 - 6.1.6. right to withdraw your consent for the processing of your personal data, if the legal basis for such processing is your consent;
 - 6.1.7. right to data portability.
- 6.2. If you wish to exercise the rights described above or if you find that your personal data has been unlawfully processed or if you have any other complaints, please contact our data protection coordinator by e-mail at afs-ee.dpc@arvato.com.

- 6.3. You also have the right to lodge a complaint with the competent data protection supervisory authority or file a claim with the court if you find that your personal data has been processed unlawfully. The competent data protection supervisory authority in Estonia is the Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon, address Tatari 39, 10134 Tallinn; e-mail: info@aki.ee ; phone number: +372 627 4135; website: www.aki.ee).