

PERSONAL DATA PROTECTION POLICY

1. GENERAL PRINCIPLES

The purpose of this confidentiality and personal data protection policy (hereinafter referred to as "the Policy") is to inform you, in a clear, complete and fair manner, of the terms and conditions under which NETiKA IT Services S.A., a limited company under Belgian law with its registered office at Rue Belliard 2A, 1040 Brussels, registered with the Banque-Carrefour des Entreprises under number 0870.454.937 (hereinafter referred to as "NETiKA ITs" or "the Company"), collects, processes, stores and, where applicable, communicates personal data concerning you, in the context of consulting its website accessible at <https://its.netika.com>, as well as in the context of providing IT services to its professional clients.

In its capacity as controller and/or processor of personal data, NETiKA ITs undertakes to ensure that your personal data is processed in accordance with Regulation (EU) 2016/679 of 27 April 2016, known as the General Data Protection Regulation (hereinafter "GDPR"), as well as any applicable national legislation on the subject.

This Policy is addressed both to users of the Company's website and to representatives, agents, or employees of NETiKA ITs' clients, partners or service providers, in the context of contractual, pre-contractual or commercial relations, as described below.

2. DATA CONTROLLER OR SUBCONTRACTOR

In the context of its activities, NETiKA ITs may act as a data controller, as a data processor or as a simple intermediary. These distinctions are essential in order to understand NETiKA ITs' responsibilities in terms of data protection.

a. NETiKA ITs as data controller

NETiKA ITs acts as data controller when it alone determines the purposes and means of processing personal data. This concerns in particular:

- The management of commercial relations with its clients and partners (prospecting, invoicing, client support, conflict management, etc.) as well as for the other purposes described in article 5 below.
- Management of its website and communication tools (cookies, contact forms, etc.).
- Recruitment and application management.

In these cases, NETiKA ITs ensures that it complies with all the legal and regulatory obligations set out in the RGPD,

particularly in terms of transparency, security and the rights of the persons concerned.

b. NETiKA ITs as a sub-contractor

NETiKA ITs acts as a subcontractor when its clients entrust it with the processing of personal data on their own behalf. This is the case, for example

- During the provision of SaaS services or software solutions hosting client, user or employee data.
- During maintenance, assistance or data hosting operations belonging to a client when NETiKA ITs is entrusted with personal data in order to carry out these tasks.

In this context, NETiKA ITs only acts on the documented instructions of the client, who remains the data controller, and undertakes to implement the appropriate technical and organisational measures to guarantee the security and confidentiality of the data. A subcontracting agreement is systematically concluded in accordance with Article 28 of the RGPD.

c. NETiKA ITs as a mere intermediary

It is expressly recalled that, in most cases, NETiKA ITs does not access the content of data hosted or processed directly by clients in third-party environments. NETiKA ITs then acts as a simple intermediary between the data controller (the client) and third-party service providers (the clients' subcontractors), in accordance with the conditions set out in the main service contract. These service providers include, but are not limited to, Microsoft (including Azure), Amazon Web Services (AWS), Google Cloud Platform (GCP), Kaseya, N-Able, WatchGuard, Veeam, Trend Micro or any other cloud service provider. In these situations, NETiKA ITs does not process or store the data entered by the client or its users in the environments of the aforementioned suppliers/providers. The processing of this data is the sole responsibility of the clients of these suppliers/providers, acting as sub processing clients and/or independent data processors, in accordance with their own data protection policies and contractual conditions. Customers are invited to consult the Data Protection Addenda of these suppliers for details of their respective commitments. It is the customer's responsibility, as the data controller, to ensure that the processing carried out in these third-party environments complies with its own obligations under the GDPR.

3. DATA WE COLLECT

NETiKA ITS, in its capacity as data controller, is likely to collect and process the following personal data:

a. Information that you send us directly

When you request our services and use our its.netika.com website, you are asked to provide us with information, some of which may identify you ("Personal Data"). This is particularly the case when you fill in forms (such as, for example, the form for your service requests or the form on our website's contact page), when you take part in our promotional offers, studies or surveys, when you contact us - whether by telephone, email or any other means of communication - or when you inform us of a problem.

This information includes the following personal data:

- Job title.
- First name and surname.
- Postal address
- E-mail address.
- Telephone number(s).
- University, degree and courses taken.
- Type of organisation (company, school, university, etc.), name of organisation, size of organisation, department and job title.
- Industry and industrial sub-sectors.
- CV information and availability.
- Delivery method and persons to whom orders are to be sent.
- Financial data (payment card details, bank details, credit card number and expiry date, name and address of cardholder).
- IP address (provided you have consented to the use of cookies in this respect).
- Where applicable, your responses to our surveys and questionnaires and the opinions you have left in order to evaluate a service carried out with one of our partners or a member of the NETiKA ITS group. This information may be used in particular to analyse the needs and satisfaction of our clients.
- The data necessary for the provision of certain services as detailed in our offers.
- Data that we may ask you to provide when you report a problem with our services, such as the purpose of your request for assistance.
- Data relating to your location where you have consented to us collecting and processing such data; and,
- any other personal data that may be relevant for the purposes set out below.

In any event, the personal data collected will be limited to that which is

necessary for the purposes set out in Article 5 below.

In addition, as part of the services provided to our clients, NETiKA ITS may also process data relating to access to licensing platforms, support requests, technical administration activities, and the elements necessary for invoicing and contractual follow-up.

With regard to data processed as part of its human resources management activities, NETiKA ITS explicitly refers to its internal documents, in particular the confidentiality policies applicable to personnel and the appendices to the work regulations, which provide a specific framework for such processing in compliance with the regulations in force.

b. Personal data we automatically collect

NETiKA ITS may also collect some of your personal data when you visit our website.

During your visits to our website, NETiKA ITS only uses cookies which are strictly necessary for the proper functioning of the site (so-called "functional" cookies). These cookies do not require your prior consent, in accordance with applicable Belgian and European data protection legislation.

If, in the future, NETiKA ITS were to use other types of cookies, such as analytical or advertising cookies, these would be clearly identified in the consent banner displayed when you browse our site. In this case, no non-essential cookies will be deposited without your explicit consent. You will be able to accept or refuse their use, cookie by cookie, via this banner.

All the information relating to the cookies used, their purpose and the length of time they are stored will be specified in our Cookies Charter, which can be accessed at any time from our site).

By completing the contact form on our website, you have expressed your free, specific and informed consent to the processing of your personal data. Your consent is also intended to enable you to exercise a degree of control over the processing of your personal data.

4. RETENTION PERIOD FOR YOUR PERSONAL DATA

Personal data processed by NETiKA ITS in its capacity as data controller or subcontractor is kept for a period strictly limited to that which is necessary to achieve the purposes for which it was collected, in accordance with article 5.1.e of the RGPD.

Generally speaking, most personal data is deleted or rendered anonymous at the end of the contractual relationship with the customer or user concerned, unless otherwise stipulated by law or contract. This includes in particular data relating to user accounts, technical access, support tickets or commercial communications, which are purged within a reasonable time following the end of the contract.

Some data must, however, be retained beyond this deadline, in particular for legal compliance or evidential purposes. Data relating to invoicing, accounting or commercial transactions are thus kept for a period of ten (10) years, in accordance with the requirements of tax law and accounting regulations in force.

Contact data obtained via the website or outside of a formal contract is kept for a maximum period of three (3) years from the last contact from the person concerned, unless the latter exercises his/her right of objection or deletion before this period expires. Data relating to job applications and curricula vitae (CVs) are kept for a maximum of 12 months from the last contact with the applicant, unless the applicant objects or expressly consents to a longer retention period.

In the event of a dispute, legal proceedings, internal investigation or suspected fraud, NETiKA ITs reserves the right to extend the retention period for the data concerned until the final closure of the file, including during the applicable legal limitation periods.

Finally, certain data may remain in residual form in backup copies (backups) generated automatically as part of the Company's business continuity and IT security policies. These copies are not actively processed, are stored in secure environments with restricted access, and are automatically deleted or overwritten at the end of their technical retention cycle.

5. PURPOSES OF COLLECTING PERSONAL DATA

The processing carried out by NETiKA ITs in its capacity as data controller is carried out for specific, explicit and legitimate purposes, and is based, depending on the case, on the performance of a contract, compliance with a legal obligation, the legitimate interest of the Company, or the prior and informed consent of the person concerned.

The data collected is used in particular to manage, execute and monitor the IT services we provide to our customers. This includes the implementation of contractually defined services, the administration of user accesses and accounts, operational communication with customers and their representatives, technical support, systems maintenance, as well as the production of administrative or contractual documents, such as estimates, invoices, service reports or service contracts.

Data may also be used to ensure the transmission of essential information relating to current or future services, such as technical notifications, scheduled service interruptions, functional or security updates, and any other communication necessary for the proper performance of the contract.

In certain cases, subject to your explicit consent or by virtue of our legitimate interest, NETiKA ITs may send you, by e-mail, telephone or any other relevant channel, information or prospecting messages relating to its services, innovations, news, professional events (such as webinars, seminars or training courses), as well as personalised offers. You may at any time exercise your right to object to these communications, in accordance with the procedures set out in article 9 of this Policy.

Data is also processed to enable you to register for events, training courses or professional activities organised by

NETiKA ITs, to manage your specific development requests, your complaints, your suggestions for improvement, as well as satisfaction surveys, internal audits or quality control procedures.

In addition, certain data is used in the context of the accounting and financial management of contractual relations, including invoicing, payment tracking, the processing of collection operations, or the transmission of funds collected on behalf of third parties when the contract so provides.

As part of our security, compliance and integrity policy, NETiKA ITs may also process personal data for the purposes of preventing, detecting and managing fraud, abuse, malicious acts or attempted intrusions into its information systems. In the event of suspicious behaviour or serious breach of contractual or legal obligations, the data concerned may be used to establish the facts, suspend or restrict access to certain services, initiate any appropriate proceedings, or terminate the contractual relationship under the conditions laid down.

When required by law or in the event of a formal and legitimate request, NETiKA ITs may be obliged to transmit certain personal data to administrative, judicial, fiscal, regulatory or supervisory authorities, at both national and European level. Such communications are strictly limited to the data required to satisfy the legal or regulatory obligation in question, and are subject, where applicable, to appropriate documentation in our processing register.

Finally, data may be used for any other purpose strictly related to the professional activity of NETiKA ITs within the limits of what is legitimate, proportionate and compatible with the rights and interests of the persons concerned.

6. RECIPIENTS OF YOUR PERSONAL DATA AND INTERNATIONAL TRANSFERS

In the course of its activities, NETiKA ITs may communicate or transfer personal data to partners or third parties, including to countries outside the European Economic Area (EEA), subject to strict compliance with applicable data protection legislation.

In the strict context of the performance of its contractual obligations, NETiKA ITs may be required to transfer certain personal data to subsequent subcontractors, also known as second-level subcontractors, or to technical or commercial partners involved in the service chain. These transfers are made only insofar as they are necessary for the proper performance of the contract and in compliance with the instructions of the customer, who is responsible for the processing.

Potential recipients include

- cloud or hosting service providers, such as Microsoft Azure, Amazon Web Services (AWS), Google Cloud Platform (GCP), Kaseya, N-Able, Veeam, WatchGuard, or Trend Micro, for the provision of infrastructure services, secure storage, backup, or licence management.

- technical service providers, such as software publishers, integration partners, maintenance or facilities management providers.
- partners contractually involved in the provision of a joint service, such as co-organisers of professional events, local support partners or experts appointed by the customer.
- payment service providers or financial intermediaries in the case of transmission of sums collected on your behalf or outsourced billing management.
- professional advisers, such as lawyers, chartered accountants or insurers, where such communication is strictly necessary for risk management or the defence of the customer's legitimate interests.
- administrative, judicial or regulatory authorities, if NETiKA ITs is legally obliged to do so or if formally instructed to do so by the client, in particular in the event of a control, audit or legal proceedings involving the data controller.

NETiKA ITs only shares your data with the third-party partners or sub-contractors mentioned above:

- when we use a service provider as part of the performance of any contract concluded between you and NETiKA ITs or in order to provide or improve our services.
- when you request it and/or we have your consent.
- when we are legally obliged to do so or if we believe in good faith that this is necessary in order to (i) respond to any claim against NETiKA ITs, (ii) comply with any legal request, (iii) execute any contract concluded with our partners, (iv) as part of enquiries and investigations, or (vi) in order to guarantee the rights or property of NETiKA ITs;
- in the event that NETiKA ITs sells or acquires a business or assets, in which case we reserve the right to share your personal data with the potential seller or buyer of this business or these assets.
- if NETiKA ITs or all or part of its assets are acquired by a third party, the data in our possession will, where applicable, be transferred to the potential purchaser while respecting the principles of data minimisation.

When you use a service or function involving a third-party partner (e.g.: connection solution via a social network or authentication via an external supplier), the processing conditions of this third party are also applicable to you. NETiKA ITs accepts no responsibility for the confidentiality policies, purposes or processing methods implemented by these third-party entities, over which it has no control. We invite you to consult the confidentiality policies of the partners concerned directly before authorising access to your data.

In the context of certain processing operations, NETiKA ITs may make use, in a controlled manner, of solutions or products incorporating artificial intelligence (AI) technologies. These tools may in particular be used to automate certain tasks, assist in data analysis or improve

the quality of the services offered, in strict compliance with the specified purposes.

Any use of AI by NETiKA ITs is carried out in compliance with the principles of the RGPD, in particular those of data minimisation, transparency, security and purpose limitation. Under no circumstances will artificial intelligence be used for automated profiling purposes producing legal or significant effects with regard to you, unless prior information is provided and your consent is obtained when required.

NETiKA ITs ensures that any third-party tool or supplier using AI presents adequate guarantees of compliance with applicable data protection regulations.

7. COOKIES

The NETiKA ITs website exclusively uses functional cookies, which are necessary for the proper functioning of the website and the provision of the service requested by the user. These cookies do not collect data for advertising or analytical purposes, and do not require prior consent in accordance with applicable legislation (RGPD and Data Protection Authority guidelines).

These cookies are generally temporary and are deleted automatically at the end of your browsing session. They are used, for example, to remember your language preferences or to ensure site security.

No advertising, audience measurement or social network cookies are placed by NETiKA ITs or any third party via this website.

In the event that NETiKA ITs decides to use other types of cookies in the future, these will be clearly indicated in a dedicated consent banner, which will allow you to accept or refuse them on a granular basis. The updated list of cookies used and their purpose can then be consulted at any time via our Cookies Charter.

8. RIGHTS OF THE PERSON CONCERNED

NETiKA ITs has implemented appropriate technical and organisational measures to ensure the protection of personal data, to ensure that it is processed in accordance with the purposes described above, and to guarantee its accuracy and regular updating.

In accordance with the RGPD, you have the following rights with regard to your personal data:

- Right to information

You have the right to be informed, in a clear, transparent and accessible manner, about how your data is collected, used, stored and shared (articles 12 to 14 of the RGPD).

- Right of access

You can obtain confirmation as to whether or not your data is being processed, and if so, access to all the following information: purposes of processing, categories of data concerned, recipients, storage period, etc. (article 15 of the RGPD).

- **Right of rectification**

You have the right to obtain the correction of inaccurate personal data concerning you, as well as to have incomplete data completed (article 16 of the RGPD).

- **Right to erasure ("right to be forgotten")**

In certain circumstances, you may request that your data be erased, in particular when it is no longer necessary for the purposes for which it was collected, or when you withdraw your consent (article 17 of the RGPD).

- **Right to limit processing**

You may request the temporary suspension of the processing of your data, for example for the time needed to check its accuracy or to exercise a right of objection (article 18 of the RGPD).

- **Right to data portability**

You have the right to receive the personal data you have provided, in a structured, commonly used and machine-readable format, and to transmit it to another controller where technically possible (Article 20 of the GDPR).

- **Right to object**

You may object at any time to the processing of your personal data on grounds relating to your particular situation, including in the case of profiling, unless there are overriding legitimate grounds for continuing the processing (Article 21 of the GDPR). You may also object without justification to any processing for commercial prospecting purposes.

- **Right to withdraw your consent**

Where processing is based on your consent, you may withdraw it at any time. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to that withdrawal (article 7 of the RGPD).

- **Right not to be the subject of an automated decision**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you (article 22 of the RGPD), except in the cases provided for by law.

You may exercise your various rights by logging into your account if you have one or by sending your request to the following address: privacy@its.netika.com.

Depending on the scope of the request, NETIKA ITS reserves the right to charge the requester a reasonable amount to cover the costs associated with access, rectification or deletion operations.

NETIKA ITS reserves the right to refuse the exercise of certain rights when:

- The processing of data is necessary to comply with a legal or regulatory obligation incumbent upon NETIKA ITS.
- The access, deletion or restriction requested is likely to infringe the rights and freedoms of others.
- A compelling legitimate interest, duly justified, prevails over your interests or rights and freedoms, for example in terms of systems security, fraud prevention or dispute management.

In such cases, you will be given a reasoned refusal.

The RGPD also gives you the right to lodge a complaint with the Belgian Data Protection Authority if you are not satisfied with the solution provided by NETIKA ITS:

Data Protection Authority
Rue de la Presse 35,
1000 Brussels, Belgium
Tel: +32 (0)2 274 48 00
Email: contact@apd-gba.be
Website: <https://www.dataprotectionauthority.be/citizen>

In the context of certain services offered, NETIKA ITS may act solely as a technical intermediary or infrastructure provider, without being directly involved in the processing of Personal Data collected or transferred by the end client.

In these specific situations, Personal Data may be transferred directly by the client or end user to third party service providers (direct subcontractors of the client) for the performance of the requested service. These third parties, acting under the responsibility of the customer, have their own confidentiality policies and are responsible for processing this data.

In this respect:

- The user acknowledges that access to certain services may require prior acceptance of the confidentiality policies specific to these third party partners.
- NETIKA ITS cannot be held responsible for the processing carried out by these third parties, as it does not act as a data controller or subcontractor in this specific context.
- Any request to exercise rights (access, rectification, deletion, opposition, etc.) concerning data processed by these partners should be addressed directly to the said service providers, in accordance with their policy and the contact details they provide.

We strongly recommend that users carefully read the privacy policy of each service provider involved before communicating their personal data or using the services concerned.

9. DATA SECURITY AND RECIPIENTS

NETIKA ITS implements all necessary measures to secure the IT infrastructure that it operates or hosts, and in which the personal data that you have chosen to entrust to it may transit or be processed. These measures aim to guarantee the confidentiality, integrity and availability of the data, and to prevent any unauthorised access, loss, alteration, destruction or illicit disclosure.

To this end, NETIKA ITS applies rigorous physical, electronic and organisational security measures, including access controls, encryption protocols for data transfers, network monitoring devices and strict management of access rights. These measures exclusively concern the technical environment placed under the direct responsibility of NETIKA ITS.

It is important to note that, in the context of certain services, NETIKA ITS acts solely as a service provider, while

the end client remains solely responsible for security decisions relating to the personal data it collects or processes. Thus, choices regarding data security, the configuration of access rights, password management or the activation of encryption functions are the responsibility of the client, and not of NETiKA ITs.

Despite the efforts made to protect personal data, no system can offer absolute security, particularly in the face of unpredictable cyber threats or technical faults beyond the reasonable control of NETiKA ITs.

Furthermore, all personal data is treated as strictly confidential. Access is limited solely to NETiKA ITs employees, sub-contractors or service providers who require it in order to fulfil their mission, and who are contractually bound by an obligation of confidentiality. Any breach of these obligations may result in disciplinary or contractual sanctions.

Finally, it is also the responsibility of each user to actively contribute to the security of their own data. You are solely responsible for the confidentiality of your identifiers, in particular your password. It is your responsibility to ensure that they are protected and that you log out of your session correctly, particularly when using a shared workstation.

10. DISPUTE RESOLUTION

If You have reason to believe that the security of Your personal data has been compromised or that it has been misused, you are invited to contact NETiKA ITs at the following address: privacy@its.netika.com.

NETiKA ITs will investigate complaints concerning the use and disclosure of personal data and will attempt to resolve them in accordance with the principles set out in this Policy.

Unauthorised access to or misuse of personal data may constitute an offence under the law.

11. CONTACT

If you have any questions regarding this Policy, if you no longer wish to receive information from NETiKA ITs or if you wish to rectify, supplement, update or delete your personal data, you may send an e-mail to the following address: privacy@its.netika.com.

12. EFFECTIVE DATE AND REVISIONS TO THE PERSONAL DATA PROTECTION POLICY

This Policy may be updated according to NETiKA ITs needs and circumstances or if required by law. We therefore invite you to take note of any updates on a regular basis.

This Policy has been in force since 01/01/2018 and was updated on 23 June 2025.