

## **Privacy Policy of Hornetsecurity GmbH**

### **for Business Contacts**

The basis of effective data protection is comprehensive information about the collection, processing, and use of your data (“data processing”). We would therefore like to inform you about the following:

- When or during which actions we process data.
- What data we process and for what reasons.
- Who receives data.
- Your rights regarding our processing of your data.

This Privacy Policy only governs the processing of personal data in the context of managing our business partners and the contact persons provided by our business partners.

#### **I. Contact information**

The party responsible (“Controller”) for data processing as defined by the General Data Protection Regulation (GDPR) is:

**Hornetsecurity Ltd.**

55 Baker Street  
London  
W1U7EU  
United Kingdom

Tel.: +44 (2030) 869-833

Email: [privacy@hornetsecurity.com](mailto:privacy@hornetsecurity.com)

We have appointed a Data Protection Officer. You can contact this officer at [privacy@hornetsecurity.com](mailto:privacy@hornetsecurity.com).

#### **II. General information about data processing**

##### **1. Scope and purpose of processing personal data**

We process your personal data for the following purposes:

- To establish contact in order to initiate, conduct, or develop a business relationship between Hornetsecurity and your company or yourself, if applicable.
- To carry out procurement processes between Hornetsecurity and business partners (supplier or partner company).

To this end, we require that you provide the following personal data:

We process the name of the company you are representing; your last name, first name, title, your business email address, your business telephone number, and your business fax number.

In the context of our business relationship, you must provide such personal data that is necessary for the establishment, implementation, and termination of a business relationship and for the fulfillment of the associated obligations, which we are required by law to collect or are entitled to collect on the basis of legitimate interests. Without this data, we are usually not able to enter into a business relationship with you.

## **2. Legal basis for processing personal data**

### **2.1. Fulfillment of contractual obligations (Art. 6 (1) (b) GDPR)**

The legal basis for processing your personal data—if you are acting on your own behalf—is Art. 6 (1) (1) b) GDPR (data processing for contract initiation and implementation).

### **2.2. Legitimate interests (Art. 6 (1) (f) GDPR)**

If you are representing a company/third party, the legal basis for processing your personal data is Art. 6 (1) (1) (f) GDPR (data processing due to overriding legitimate interest). This interest consists of ensuring that the business relationship is practicable by making contact persons available at the respective business partners.

We also have a legitimate interest in developing our business relationship with you and your company. In this context, information from partners can be cross-checked with information from our distributors.

### **2.3. In order to fulfill a legal obligation (Art. 6 (1) (c) GDPR)**

In individual cases, the purposes of data processing are based on legal requirements. These legal obligations include, for example, the fulfillment of retention and identification obligations, for instance in the context of obligations relating to the prevention of money laundering, fiscal inspection and reporting requirements, and data processing as part of requests from public authorities.

## **3. Recipients**

We share your personal data with service providers used by us or acting on our behalf (so-called “processors”) (for example, IT service providers, CRM software). We carefully select such processors and regularly screen them to ensure that your privacy is protected. These processors may only use the data for the purposes and according to instructions specified by us.

In the context of developing our business relationship with you or your company, the distributor assigned to your company may receive personal data.

## **4. Data transfer to third countries**

As part of the involvement of our processors, your data may also be transferred to countries outside the European Union or the European Economic Area. This will only be done insofar as an adequate level of data protection of the third country is ensured in accordance with an adequacy

decision of the European Commission or appropriate safeguards (for example, data protection contracts using the standard data protection clauses of the European Commission) can ensure adequate protection of your personal data. A copy of these guarantees can be provided on request.

## **5. Data deletion and length of storage**

Your personal data will be deleted once the relevant information is no longer required to fulfill the purpose of its storage.

Moreover, we are subject to various retention and documentation obligations, including those stipulated in the Commercial Code (HGB) and Tax Code (AO). The periods of retention or documentation specified therein can last up to ten years. Irrespective of the purpose for which we originally collected your data, we will store this data for as long as it is required in order to fulfill these retention and documentation obligations. In addition, the statutory limitation periods will ultimately dictate the length of storage, whereby the standard statutory limitation period is three years.

## **III. Right of objection and removal**

Where data processing is based on your consent or our legitimate interest, you have the right, at all times, to object to such processing or to withdraw your consent. You can send an email to [privacy@hornetsecurity.com](mailto:privacy@hornetsecurity.com) at any time in order to exercise your right of objection or withdrawal. If you object to a processing activity performed on the basis of our legitimate interest, we may continue to perform this activity if we can prove that there are compelling legitimate grounds for such action that outweigh your interests, rights, and freedoms.

## **IV. Rights of data subjects**

If personal data concerning you is processed, you are considered a data subject as defined by Art. 4 (1) GDPR. As a data subject, you have the following rights in relation to your personal data. In order to exercise these rights, you can contact us using the aforementioned contact details.

### **Right of access according to Art. 15 GDPR**

You have the right to information about the personal data concerning you that we process. This includes the mandatory information set forth in Art. 15 GDPR.

### **Right to rectification according to Art. 16 GDPR**

You have the right to request that incorrect personal data be immediately rectified and inaccurate personal data be completed.

### **Right of erasure according to Art. 17 GDPR**

You have the right to request that your personal data be deleted if one of the reasons specified in Art. 17 GDPR applies, in particular if the legal basis for processing no longer applies.

### **Right to restriction of processing according to Art. 18 GDPR**

You have the right to request that the processing of your personal data be restricted if one of the reasons specified in Art. 18 GDPR applies, in particular if this is deemed preferable to the deletion of such data.

**Right to data portability according to Art. 20 GDPR**

In accordance with Art. 20 GDPR, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format; you also have the right to transmit said data to another controller without hindrance from the controller to which the personal data has been provided.

**Right to file a complaint with the competent supervisory authority, Art. 77 GDPR**

In accordance with Art. 77 GDPR, you have the right to file a complaint with the competent supervisory authority.

As at: June 2023