

# General Privacy Notice

## 1. Introduction

The Boldyn Networks Group of companies ("Boldyn", "we", "our") are committed to protecting your privacy and Processing your Personal Data fairly and lawfully.

This General Privacy Notice ("Privacy Notice") applies to:

- Our current or potential customers, suppliers and vendors and their representatives;
- Visitors to our offices, Base Station Hotels (BSH) and Network Operations Center (NOC) locations;
- Users of our mobile applications, other than where those applications have their own privacy notice which applies in such circumstances; and
- Visitors to our website or social media platforms that reference this Privacy Notice,

in each instance referred to as "you".

If you are a job applicant, former or current employee, contractor, or officer/director ("Boldyn Staff"), or an emergency contact or dependent of Boldyn Staff, please contact us using the details under "Contact Us" below to obtain a copy of the Privacy Notice that is relevant to you.

In the course of our business, we may need to Process your Personal Data and this Privacy Notice details what information is collected, how it is Processed, how long it is stored for, the purpose of Processing Personal Data and with whom it may be shared. We also advise how you may request access to your Personal Data and how to make a complaint.

The data controller in relation to the Processing activities described below is:

- the Boldyn company your company contracts with or visits; or
- Boldyn Networks Group Limited for users of our mobile applications (other than where those applications have their own privacy notice) and our website the data controller in relation to the Processing activities described below.

This means that we determine the purposes for which and the means by which your Personal Data is Processed. Where Processing of Personal Data is undertaken by other Boldyn Networks Group companies for their own independent purposes, such companies may also be controllers of your Personal Data. This Privacy Notice is provided on behalf of each relevant Boldyn company. If you have any questions about this statement or our privacy practices, please contact our privacy team by emailing [privacy@boldyn.com](mailto:privacy@boldyn.com).

This Privacy Notice does not form part of any contract for services, unless otherwise specified in such contract. We may amend parts of this Privacy Notice from time to time in order to maintain our compliance with applicable laws and regulations or following an update to our internal practices. Any changes will be notified to you by posting an updated version on our website. Therefore, please ensure that you regularly check this Privacy Notice, so you are fully aware of any changes or updates.

## 2. Definitions

**Personal Data** is data by which a living person can be identified directly or indirectly. Personal Data may include a name, personal email address, phone number, credit card number, bank details, health care details or date of birth. Where a piece of data that can't be used to identify an individual on its own, is combined with other data held and is then able to identify an individual then all of that data is Personal Data.

**Process/Processing** encompasses almost any handling or use of Personal Data, including (but not limited to) collection, recording, organization, modification, transfer, storage, and deletion.



### 3. When we collect Personal Data

We may collect Personal Data directly from you when you:

- Make an enquiry or contact us during the ordinary course of business such as by online enquiry, email phone or by letter;
- Purchase or request products or services from us;
- Use our website (including automatically via technology such as cookies);
- Use our mobile applications;
- Interact with our social media accounts, e.g., via Facebook, LinkedIn or Twitter;
- Notify us of a data breach, exercise your privacy rights or make a complaint; and
- Complete any surveys we contact you about.

### 4. Types of Personal Data we collect about you

We typically Process the following types of Personal Data about you:

- Personal details, including name, surnames, home address, personal email address and personal phone number, home contact details, emergency contact details, country of residence;
- Professional details, including your work email address, your role, industry, location, position and/or job title within your employment, and other work contact details;
- Details of your visits to our premises and to systems, software, websites, and applications including access and location data, CCTV footage and communications data; and
- Details of transactions you carry out with us in the course of business or through our website.

We make every effort to maintain the accuracy and completeness of your Personal Data which we store and will promptly update your Personal Data when you notify us of changes. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete Personal Data that you provide to us.

### 5. How we lawfully Process your Personal Data

We will only Process your Personal Data where we have a lawful basis for doing so, such as where:

- You have given your consent to such Processing. Please see the Marketing section (section 13) below in this Privacy Notice. You may withdraw your consent for us to use your Personal Data at any time. Please see section 10 on withdrawing your consent for further details;
- The Processing is necessary for the performance of a contract to provide our services such as when we are providing you with any of our products and services;
- The Processing is necessary for compliance with our legal obligations, such as:
  - To keep certain financial records for compliance with accounting and tax rules; and
  - To comply with a request from you in connection with the exercise of your rights; or
- The Processing is necessary for our legitimate commercial interests or those of any third-party recipients that receive your Personal Data, such as:
  - Operating and maintaining contracts with our suppliers and service recipients; and
  - For the establishment and defense of our legal rights.



## 6. How we use Personal Data

We will Process the following categories of Personal Data in connection with the management of our relationship with you, for the following purposes and legal bases:

### Current and potential customers, suppliers and vendors or their representatives (as applicable):

Purposes	Categories of Personal Data	Legal Basis
To provide you or your employer with requested products or services	Professional details Details of transactions you carry out with us	Performance of a contract
For account management purposes and to keep in touch with you about requested products or services	Professional details Personal details Details of transactions you carry out with us	Performance of a contract Legitimate interests in maintaining up to date records, ensuring business continuity and operating our business
To identify persons authorized to trade on behalf of our Customers, Suppliers and/or Service Providers	Professional details Personal details	Performance of a contract Legitimate interests in operating our business and providing our commercial services to our customers
To communicate with you about services, features, surveys, newsletters, offers, promotions, events, and provide other news or information about our services	Professional details Personal details	Legitimate interests in marketing, promotion and advertising purposes where the law does not require consent  Consent where the law requires us to collect your consent

Please refer to the section on "All data subjects" below for some additional purposes for Processing.

### Visitors to our offices, websites, social media platforms; users of our mobile applications:

Purposes	Categories of Personal Data	Legal Basis
To protect the security and access of our systems, premises, staff and visitors, platforms and secured websites and applications	Details of your visits to our premises and to systems, software, websites and applications (including system logs and CCTV) Details of transactions you carry out with us	Legitimate interests in protecting our users, services and business against fraud and other illegal activity  Legitimate interests in ensuring the safety and security of our people, goods, premises and systems, and taking action to mitigate risk and to prevent and detect matters which may put us, or our business or stakeholders, at risk
To communicate with you about	Professional details	Legitimate interests in



services, features, surveys, newsletters, offers, promotions, events, and provide other news or information about our services (where you have asked us to send you this information)	Personal details	marketing, promotion, and advertising purposes where the law does not require consent  Consent where the law requires us to collect your consent
To understand how visitors interact with our website, for site improvement and product / service development purposes (where you have agreed to accept analytics cookies)	Professional details  Personal details	Consent (where you have provided this)
To provide you with customized advertisements on our website and to measure the effectiveness of our marketing campaigns (where you have agreed to accept advertising cookies)	Details of transactions you carry out with us	Consent (where you have provided this)

Please refer to the section on "All data subjects" below for some additional purposes for Processing.

**All data subjects:**

Purposes	Categories of Personal Data	Legal Basis
To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies	Professional details  Personal details  Details of your visits to our premises and to systems, software, websites, and applications  Details of transactions you carry out with us	Compliance with legal obligations
For monitoring and assessing compliance with our policies and standards	Professional details  Personal details	Compliance with legal obligations  Legitimate interest in ensuring that we conduct our business in compliance with applicable law and standards
To comply with court orders and exercise and/or defend our legal rights	Professional details  Personal details  Details of your visits to our premises and to systems, software, websites, and applications  Details of transactions you carry out with us	Compliance with legal obligations  Legitimate interests to assist law enforcement authorities to prevent or detect serious crime
As otherwise permitted or required by any applicable law or regulation	Professional details	Compliance with legal obligations



	Personal details  Details of your visits to our premises and to systems, software, websites, and applications  Details of transactions you carry out with us	
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**Staff Next of Kin and Dependents:**

We may process your Personal Data for staff management purposes as follows:

Purposes	Categories of Personal Data	Legal Basis
To contact you in the event of an accident or emergency	Personal details (contact details)	Our legitimate interest in complying with the wishes of our staff
To keep a record of, to contact you about, and to support the provision of/provide any benefits to which you may be entitled	Personal details	Your, and the relevant staff members, legitimate interest in you receiving benefits to which you are entitled.

We may additionally process your Personal Data to comply with our legal obligations and to exercise/defend our legal rights as set out in [para i] of the “Current Staff” section above.

**7. Who we might share your Personal Data with**

We do not and will not sell, license or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this Privacy Notice and, in particular, to the following recipients:

- To any of our Boldyn Networks Companies (in accordance with our Intra-Group Data Processing Agreement or any other relevant intra-company policies and procedures);
- To our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf (for example cloud services providers, hosting, email and content providers, administrative services providers, and if you have given your consent to this, marketing agencies and/or providers of website analytics services);
- To any third-party to whom we assign or novate any of our rights or obligations;
- To any prospective buyer in the event we sell any part of our business or assets; and/or
- To any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

When we use third-party service providers, we only disclose to them any Personal Data that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and do not use it other than in accordance with our specific instructions.

When you visit our websites, with your consent, we may set certain cookies (please click the image of a cookie for more information). When you have agreed to set analytics cookies, we share certain data with Google which they may use to improve their products and services – please see [Privacy Policy – Privacy & Terms – Google](#); where you have agreed to set advertising cookies, we share certain data with LinkedIn which allows LinkedIn to better target adverts – please see the [LinkedIn Privacy Policy](#).



## 8. How we protect your Personal Data

We are committed to safeguarding and protecting your Personal Data and we have implemented and maintained appropriate technical and organizational measures to ensure a level of security appropriate to protect any Personal Data provided by you to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored, or otherwise Processed.

If you have any questions about the security of your personal information, you can contact us via the contact details set out in section 15 below.

## 9. How we protect your Personal Data if we send it overseas

From time to time your Personal Data may be transferred to other Boldyn companies to Process for the purposes described in this Privacy Notice (for example, to provide a service requiring the coordination of our staff from international offices). Some of these companies are located outside of the UK or EEA, for example, certain individuals are employed by Boldyn companies in the US.

Personal Data will also be transferred to third parties (e.g., service providers) who may have systems or suppliers located outside of the UK or EEA.

Accordingly, the Personal Data we collect may be transferred to (including accessed or stored in) a country or territory outside of the UK or EEA, including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the UK or EEA, such as the US.

We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by applicable data protection law, in particular the Standard Contractual Clauses approved by the European Commission, with the UK addendum thereto as appropriate, and supplemented by additional contractual, organizational and security measures as necessary.

Copies of the relevant safeguard documents are available by contacting us at the details provided in section 15 below. Please note that any data transfer agreement made available to you may be redacted for reasons of commercial sensitivity.

## 10. Your rights in relation to the Personal Data we collect

Under certain circumstances and subject to applicable laws, you have various rights regarding your Personal Data, which may include:

- a) **Right to access:** You have the right to obtain the confirmation of the existence or non-existence of the Processing of your Personal Data and receive copies of such Personal Data.
- b) **Right to rectify:** You have the right to request that we rectify inaccuracies in your Personal Data or complete it.
- c) **Right to erasure:** You can ask us to delete your Personal Data in the following cases:
  - a. When it is no longer necessary for the purposes for which it was collected;
  - b. You have revoked your consent;
  - c. Following the exercise of your right to object;
  - d. Your Personal Data has been Processed unlawfully; or
  - e. To comply with a legal obligation.

We are not obliged to comply with your request for erasure of your Personal Data, in particular if its Processing is necessary for compliance with a legal obligation or for the establishment, exercise or defense of legal claims.



- d) **Right to restrict:** You may ask us to restrict the Processing of your Personal Data (i.e., to retain it without using it) when:
- its accuracy is disputed;
  - its Processing is unlawful, but you do not want it deleted;
  - it is still necessary for the establishment, exercise or defense of legal claims;
  - we verify the existence of compelling reasons in connection with the exercise of your right to object.

We may continue to use your Personal Data following a request for restriction (i) with your consent, or (ii) for the establishment, exercise, or defense of legal claims; or (iii) to protect the rights of any other natural or legal person.

- e) **Right to portability:** You may ask us to provide you with your Personal Data in a structured, commonly used, and machine-readable format, or you may request that it be transmitted directly to another controller, but only if the Processing is based on your consent or the performance of a contract with you and the Processing is automated.
- f) **Right to withdraw your consent:** You can withdraw your consent to Process your Personal Data at any time, if the Processing is based on your consent, without affecting the lawfulness of the Processing based on your consent and carried out prior to your withdrawal of consent. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using the unsubscribe tool in that communication (if it is an email), or by contacting us via the contact details in section 15 below. If you have provided consent for your details to be shared with a third party, and wish to withdraw this consent, please also contact the relevant third party in order to amend your preferences.
- g) **Right to object:** Where we are relying upon legitimate interest to Process Personal Data, then you have the right to object to that Processing. In such case, we must stop that Processing unless we can either demonstrate legitimate grounds for the Processing that override your interests, rights, and freedoms or where we need to Process your Personal Data for the establishment, exercise, or defense of legal claims. You also have the right to object to receiving any direct marketing to which you previously opted in.

You can exercise your rights by contacting us using the details set out in section 15 below. We endeavor to respond to such requests promptly, although we reserve the right to extend this period for complex requests, in accordance with applicable law.

In any of the situations listed above, in case of doubt about your identity, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data.

## 11. How long we hold your Personal Data for

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, or internal policy requirements.

Further information about retention periods can be obtained by contacting us using the details in section 15 below.

## 12. Links to other websites

We may provide links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third-party website. If you visit these websites, they will be governed by their own terms of use (including privacy policies).



### 13. Our Marketing

We may Process your preferences to receive marketing information directly from us by email and text in the following way:

- If you place an order with us for a product or service, we may contact you with marketing information in the ways mentioned in the notices presented to you as part of that transaction, except where you indicate you would prefer otherwise.
- If you do not complete a purchase and have not indicated that you would prefer otherwise, we may remind you by phone or email about your incomplete purchase.
- From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you want to continue receiving marketing information from us.
- We may contact you with marketing information by post and telephone by using your Personal Data or with targeted advertising delivered online through social media and platforms operated by other companies using their profiling tools or use your Personal Data to tailor marketing to improve its relevance to you unless you object.

You can amend your marketing preferences at any time by contacting us via the contact details in section 15 below.

### 14. Third Party Marketing

We will only share your Personal Data with our third-party partners for them to contact you directly with marketing information about their products and services where you have indicated to us that you would like us to do so.

Once shared, the relevant third party’s privacy policy will apply to their Processing of your Personal Data, not ours. If you’d like to opt out of receiving marketing from a third party after providing your consent, you can do so at any time by contacting the relevant third party directly.

You have the right to opt out of our use of your Personal Data to provide marketing to you in any of the ways mentioned in this Privacy Notice. Please also see section 10 on withdrawing your consent and on objecting to our use of your Personal Data and automated decisions made about you.

### 15. How you can contact us

If you have any queries about the contents of this Privacy Notice, or wish to inform us of a change or correction to your Personal Data, would like a copy of the Personal Data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Jurisdiction	Entity	Address	Email
Canada	Boldyn Networks Canada Inc.	100 King Street West, Suite 6200, 1 First Canadian Place, Toronto, Ontario, Canada, M5X 1B8	<a href="mailto:privacy@boldyn.com">privacy@boldyn.com</a>
Finland / France / Spain	Boldyn Networks Finland Oy  Boldyn Networks France	Gräsantörma 2, 00220 Espoo, Finland.	<a href="mailto:privacy@boldyn.com">privacy@boldyn.com</a>





	Boldyn Networks Spain SL		
Hong Kong	Boldyn Networks HK Limited	Unit Nos 2101-5, 21/F, 6 Shing Yip Street, Kwun Tong, Hong Kong	<a href="mailto:privacy@boldyn.com">privacy@boldyn.com</a>
Ireland	Boldyn Networks Ireland Ltd	14c Cashel Business Centre, Cashel Road, Dublin 12, Ireland	<a href="mailto:privacy.eu@boldyn.com">privacy.eu@boldyn.com</a>
U.K.	Boldyn Networks UK Limited  Boldyn Networks Infrastructure UK Limited  Boldyn Networks Global Ltd  Boldyn Networks PNE UK Limited	2 <sup>nd</sup> Floor, 2 Kingdom Street, London W2 6BD, United Kingdom	<a href="mailto:privacy.eu@boldyn.com">privacy.eu@boldyn.com</a>
United States	Boldyn Networks Transit US LLC  Boldyn Networks US LLC (and affiliates)  Boldyn Networks US VII LLC  Boldyn Networks Infrastructure LLC	1400 Broadway, 17 <sup>th</sup> Floor, New York, NY 10018  Attn: Legal Department	<a href="mailto:privacy.us@boldyn.com">privacy.us@boldyn.com</a>

Our DPO can be contacted using the following details:

- All Boldyn Networks Group of companies (outside of Italy): John Mackay at [john.mackay@boldyn.com](mailto:john.mackay@boldyn.com) or at Boldyn Networks Head Office at 2<sup>nd</sup> floor, 2 Kingdom Street, London W2 6BD, United Kingdom

## 16. Complaint process

We would like to be able to resolve all your concerns, and we hope that we can do so. Where we have not been able to do this, you have the right to contact the appropriate data protection regulator if you consider that we have breached your data protection rights.

The contact details of the appropriate data protection regulators are as follows:

Jurisdiction	Regulator	Website	Contact Details
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Finland	Office of the Data Protection Ombudsman	<a href="#">Office of the Data Protection Ombudsman   Data Protection Ombudsman's Office (tietosuoja.fi)</a>	Tel: +358 29 566 6700 Email: tietosuoja@om.fi
France	Commission Nationale Informatique & Libertes (CNIL)	<a href="#">Contact us   CNIL</a>	Tel: +33 (0)1 53 73 22 22
Germany	German Federal Commissioner for Data Protection and Freedom of Information	<a href="#">BfDI - Contact (bund.de)</a>	Tel: +49(0)228 997799-0 Email: poststelle@bfdi.bund.de
Hong Kong	Privacy Commissioner for Personal Data	<a href="#">Contact Us (pcpd.org.hk)</a>	Tel: 2827 2827 Email: communications@pcpd.org.hk
Ireland	Data Protection Commission	<a href="#">Homepage   Data Protection Commission</a>	Tel: (01) 765 01 00
Spain	Agencia Espanola de Proteccion de Datos (AEPD)	<a href="#">How can we help you?   AEPD</a>	Tel: 900 293 183
Sweden	Swedish Authority for Privacy Protection	<a href="#">Swedish Authority for Privacy Protection   IMY</a>	Tel: 08-657 61 00 Email: imy@imy.se
UK	Information Commissioner's Office (ICO)	<a href="#">Information Commissioner's Office (ICO)</a>	Tel: 0303 123 1113
United States	Federal Trade Commission (FTC)	<a href="#">Protecting Consumer Privacy and Security   Federal Trade Commission (ftc.gov)</a>	Tel: (202) 326-2222

