



## Privacy Notice

### ADB SAFEGATE Commitment to Data Privacy Protection

Protecting the security and privacy of your personal data is important to ADB SAFEGATE; therefore, we conduct our business in compliance with applicable laws on data privacy protection and data security, including the General Data Protection regulation 2016/679.

### Personal Data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

ADB SAFEGATE is the data controller. This means it decides how your personal data is processed and for what purposes.

ADB SAFEGATE complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely, by not collecting or retaining excessive amounts of data; by protection personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Through our websites, ADB SAFEGATE will not collect any personal data about you (e.g. your name, address, telephone number or e-mail address), unless you voluntarily choose to provide us with it (e.g. by registration, survey), respectively, provide your consent, or unless otherwise permitted by applicable laws and regulations for the protection of your personal data.

### Purpose of use and legal basis

The legal basis for processing your personal data is your explicit consent, or when the processing is necessary for the performance of our contract with you.

When you do provide us with personal data, we usually use it to respond to your inquiry, process your order or provide you access to specific information or offers. Also, to support our customer relationship with you:

- we may store and process personal data and share it with our affiliates to better understand your business needs and how we can improve our products and services; or
- we (or a third party on our behalf) may use personal data to contact you about a ADB SAFEGATE offer in support of your business needs or

to conduct online surveys to understand better our customers' needs. If you choose not to have your personal data used to support our customer relationship (especially direct marketing or market research), we will respect your choice. We do not sell or otherwise market your personal data to third parties, except to ADB SAFEGATE affiliates.

#### Purpose Limitation

ADB SAFEGATE will collect, use or disclose personal data supplied by you online only for the purposes disclosed to you, unless the disclosure:

- is necessary to prepare, negotiate and perform a contract with you,
- is required by law or the competent governmental or judicial authorities,
- is necessary to establish or preserve a legal claim or defense,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on ADB SAFEGATE information technology systems.

#### Retention of data

We keep your personal data for no longer than reasonably necessary for any legal claims/ complaints, in line with the statute of limitations.

#### Your rights and your personal data:

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- the right to request a copy of your personal data which ADB SAFEGATE holds about you;
- the right to request that ADB SAFEGATE corrects any personal data if it is found to be inaccurate or out of date
- the right to request your personal data is erased where it is no longer necessary for ADB SAFEGATE to retain such data;
- the right to withdraw your consent to the processing at any time;
- the right to object to the processing of personal data for direct marketing
- the right to lodge a complaint with the supervisory authorities

#### Communications or Utilization Data

Through your use of telecommunications services to access our Web site, your communications data (e.g. Internet protocol address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated



and could conceivably relate to personal data. To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

#### Non-Personal Data Collected Automatically

When you access our web sites, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the Web site from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our worldwide affiliates to monitor the attractiveness of our Web sites and improve their performance or content.

#### "Cookies" - Information Stored Automatically on Your Computer

When you view one of our web sites, we may store some data on your computer in the form of a "cookie" to automatically recognize your PC next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a Web site to better match your interests or to store your password to save you having to re-enter it each time. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored.

#### Children

ADB SAFEGATE will not knowingly collect personal data from children without insisting that they seek prior parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent pursuant to local law and regulations or to protect a child. The definition of "child" or "children" should take into account applicable laws as well as national and regional cultural customs.

#### Links to Other Websites

ADB SAFEGATE websites contain links to other web sites. ADB SAFEGATE is not responsible for the privacy practices or the content of other Web sites.

#### Contact details

To exercise all relevant rights, queries or complaints, please contact:  
[privacy@adbsafegate.com](mailto:privacy@adbsafegate.com)