

## PRIVACY NOTICE

Pentana Solutions Ltd. (hereinafter referred to as “**Pentana**” or the “**Company**”) cares about your privacy and is committed to processing your personal data in accordance with applicable European and UK data protection laws. Accordingly, by means of this notice, Pentana wishes to inform your personal data contained in documents or disclosed for the purposes of our relationship shall be treated and processed in compliance with the data protection laws.

In accordance with the terms of Article 13 of Regulation (EU) 2016/679 (the “**General Data Protection Regulation**” or “**GDPR**”), Pentana wishes to provide you with the following information:

### **1. Types of data collected**

#### *Personal data of the customer*

Pentana collects and processes data relating to customers contained in contracts or disclosed in the course of any business relationship.

The above data includes in general:

- personal details (name, address, etc.);
- contact details (telephone number, e-mail address etc.);
- bank details and tax details;
- other types of data relating to the customer and necessary to provide the service or product requested (e.g. logging data).

### **2. Purpose and legal basis of processing**

The data provided by the customers to Pentana shall be processed for the following purposes:

- (a) fulfilling the obligations under the contract by providing the service or product required by the customer;
- (b) providing assistance and maintenance for the service or product required by the customer, pursuant to the conditions or terms provided by the contract;
- (c) fulfilling obligations under the applicable tax and accounting laws;
- (d) enforcing or defending any rights in legal proceedings;
- (e) sending marketing and promotional e-mails in respect of services and products provided by Pentana.

### **3. Period of storage of personal data**

The personal data collected and processed as a result of the formation and carrying out of a contractual relationship shall be stored for the entire duration of the relationship and then immediately erased, save for that personal data which is necessary to enforce or defend any rights in legal proceedings or for the purposes of complying with tax, accounting and administrative laws and regulations or for the purposes of complying with other obligations at law and in order to provide documentary evidence of the work undertaken. Such data will be erased in accordance with the time periods and terms of the above laws and regulations.

### **4. Means of processing**

The personal data will be stored and processed using electronic means and will be recorded in both electronic (soft copy) and hard copy form, organised on data bases, and on any other type of appropriate support. Specific security measures shall be met in order to prevent the loss of personal data, unlawful or incorrect use and unauthorised access.

## **5. Disclosure and supplying of personal data**

The disclosure and/or supplying of personal data as indicated in paragraph 2 (a), (b) and (c) is necessary for the purposes of the conclusion and performance of the contract between Pentana and the customer and thus it is compulsory for said purposes: failure on the part of the customer to disclose and/or supply the personal data will make it impossible for Pentana to fulfil its obligations under the contract. The disclosure and/or supplying of personal data for the purposes as per paragraph 2 (e) is optional: failure on the part of the customer to disclose and/or supply such personal data may make it impossible for Pentana to provide possible additional services which are guaranteed in favour of the customer.

## **6. Parties to whom personal data may be transmitted**

The personal data collected shall not be disseminated. However, personal data may be communicated to parties who have the right or interest to have access to your personal data, in accordance with the applicable data protection laws. Further, personal data may also be communicated to personnel of the Company, as well as to companies, associations or professional firms, which carry out services and/or work on behalf of the Company for the purposes of carrying out legal obligations, as well as for organisational or administrative purposes in order to provide the services required.

The names of any other parties which may become aware of your personal data in their capacity as “Controller” are indicated in a list held at Pentana (which may be requested at the addresses, using the contact details indicated in paragraph 9 below).

## **7. Transfers of personal data outside the territory of the European Union or to international organisations**

The Company does not transfer personal outside the territory of the European Union. The Company ensures that data are stored in servers managed by Pentana’s cloud service provider (Verizon Pty Ltd.) located in the UK or in the Netherlands.

## **8. Rights of the interested party**

The customer shall be entitled to:

- request access to the personal data that the Company holds in respect of it;
- request that the Company corrects or completes personal data;
- obtain restriction of the processing of personal data for specific purposes;
- request personal data portability;
- object to the processing of personal data;
- request erasure of personal data;
- withdraw consent, where applicable, to personal data processing;
- file a complaint with the Information Commissioner’s Office in accordance with the procedures set out at [www.ico.org.uk](http://www.ico.org.uk).

## **9. Controller - Processor**

The Company is the controller of the personal data and may be contacted at: Pentana Solutions Ltd., [secretary@pentanasolutions.com](mailto:secretary@pentanasolutions.com), Stefan Grammenos FCPA, 549 Blackburn Road Mt Waverley VIC 3149, Australia.

The Company has entrusted **Giacomo Mazzanti** as the controller’s representative, and he/she may be contacted at [secretary@pentanasolutions.com](mailto:secretary@pentanasolutions.com) in order to (a) request any information on data processing or (b) exercise the rights indicated in paragraph 8 above.