



## PRIVACY POLICY

### Preliminary

**VNN LABS LIMITED** is committed to safeguarding your personal data and privacy. The specific personal data we collect varies based on the services requested and agreed upon. These services are provided by VNN Labs Limited, its affiliates, and related entities (collectively referred to as "**VNN**," "**we**," "**us**," or "**our**"). This commitment extends to all entities that are either directly or indirectly controlled by, or under common control with, VNN.

This Privacy Policy outlines how we collect, use, and process your personal data, how we fulfill our legal obligations to you, and inform you of your privacy rights under the Law Providing for the Protection of Natural Persons with regard to the Processing of Personal Data for the Free Movement of such Data, L.125(I)/2018, as amended, and the EU General Data Protection Regulation (GDPR) 2016/679.

This Privacy Policy is directed to:

- (a) The candidates/job applicants.
- (b) To natural persons who have a contractual employment relationship with VNN.

### Who we are

VNN is a company duly incorporated and validly existing under the laws of the Republic of Cyprus with registration number HE 381799, having its registered office address at Spyrou Kyprianou 84, 4004, Limassol, Cyprus.

We have appointed a Data Protection Officer – DPO who is responsible for overseeing questions in relation to privacy issues. Any questions about this Privacy Policy or any requests to exercise your legal rights should be addressed to the Data Protection Officer – DPO using the below details:

**Email address:** [dpo@vnnlabs.com](mailto:dpo@vnnlabs.com)

**Postal address:** Spyrou Kyprianou 84, 4004, Limassol, Cyprus.

### Collection and Use of your Personal Data

'**Personal Data**' means any information relating to you that identifies you or could reasonably be used to identify you, and that is recorded in any form.

If you are a candidate/job applicant, we may collect the following personal data about you:

- (a) Identity Data such as first name, maiden name, last name, ID number, Passport number, title, data of birth (city and Country) and gender. We may collect the same identity data of your dependents (for subsequent travel arrangements in case your job application will be successful).
- (b) Children's Data - We recognize the importance of protecting children's privacy. We may collect personal data related to children only after obtaining consent from their parents or legal guardians, or as otherwise permitted by law. This data is collected solely for relocation purposes if your job application is successful.
- (c) Contact data such as residential or business address, email address and telephone numbers.
- (d) Additionally, we may collect marital status, IP address, insurance information, family member information, nationality, credit preference agency data, residence or work permit in case of non-EU



Nationals, employment position, educational background, employment history, tax information (e.g. tax identification number, tax residency).

If you are a person having a contractual relationship with us, we may collect the following personal data:

- (a) Identity Data such as first name, maiden name, last name, ID number, Passport number, title, date of birth (city and country) and gender.
- (b) Contact data such as residential or business address, email address and telephone numbers.
- (c) Marketing and Communications Data like your preferences in receiving marketing from us.
- (d) Other Data: we may collect banking details, marital status, employed/self-employed status, if you hold/held a prominent public function (for Politically Exposed Persons – PEP's). FATCA/CRS info, authentication data (e.g. signature), IP addresses, financial account information such as bank details, insurance information, family member information, nationality, residence or work permit in case of non-EU nationals, employment position, educational background, employment history.

We may also obtain personal data arising from the performance of our contractual obligations such as tax information (e.g. defense tax, tax residency, tax identification number), financial information (as expected annual credit/debit turnover, nature of transactions, source of income, source of assets).

### **Collection of Personal Data**

We collect and process different types of personal data, which we receive from you directly or from our contractors in person or via their representatives in the context of the contractual relationship we have with you.

To the extent permitted by the law and for the fulfillment of our contractual or potential contractual relationship, we may collect and process personal data which has been lawfully obtained from third parties, e.g. Public Authorities or companies that introduce you to us and/or from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver, commercial registers, the press, media and the Internet).

### **Background checks**

Before making a final decision to recruit you or enter into a contractual relationship with you, we may collect and process information relating to your criminal record in order to satisfy ourselves that there is nothing in your criminal convictions history which will prevent us from hiring you or entering into a contractual relationship with you. We seek to ensure that information collection and processing is always proportionate.

### **Purposes of Processing your Personal Data**

In holding and processing your personal information, we comply with the EU GDPR and the local legislation of the jurisdiction in which we operate – Cyprus (The Law Providing for the Protection of Natural Persons with regard to the Processing of Personal Data for the Free Movement of such Data L.125 (I)/2018 – “Data Protection Law”) as these may be amended from time to time.

We will use your personal data for one or more of the following reasons:

- (a) To conduct the recruitment process. In accordance with applicable law, your personal data may be retained and used to process your application for other open positions within VNN which may be suitable, unless you object to such processing in which case they will be deleted;



- (b) To perform the contract we are about to enter into or have entered into with you;
- (c) For our legitimate interests;
- (d) To comply with a legal or regulatory obligation;
- (e) Where disclosure is necessary for Public Authorities;
- (f) Where you have provided your consent, you have the right to revoke your consent at any time.

### **Transfer of your Personal Data and Personal Data Recipients**

In the course of the performance of our contractual and statutory obligations, your personal data may be provided to different departments within VNN and/or third parties providing services to us. If it is necessary to share your personal data with a third-party service provider so we may perform our services and/or legal obligations, we enter into a contractual agreement with such third party to ensure that they comply with the Data Protection Law and GDPR and they observe confidentiality. We require all third-party service providers to respect the security of your personal data and to treat it in accordance with the Law. We only permit our third-party service providers to use your personal data for specified purposes and in accordance with our instructions and we only provide the necessary information they need to perform their specific services.

Your personal data may be transferred to countries outside the European Economic Area (EEA) if this is necessary for the performance of our contractual relationship or if such transfer is required by Law. To protect your personal data, we implement at least one of the following safeguards:

- We may enter into specific contracts as provided by the European Commission (such as the Standard Contractual Clauses).
- We may transfer personal data to countries for which the European Commission has judged by its decisions (Adequacy Decisions) that transfer to these countries is safe because they ensure an equivalent level of personal data protection. Countries to which the transfer of personal data is assimilated to intra-EU transmission of personal data can be found here: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en?prefLang=el](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en?prefLang=el).
- In case that our contractors/providers are based in the U.S., we may transfer data to them if they are certified under the EU-U.S. Data Privacy Framework . For more information, please click here: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers\\_en#:~:text=The%20adequacy%20decision%20on%20the](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en#:~:text=The%20adequacy%20decision%20on%20the).

Recipients of personal data may be, for example: third-party service provider(s), income tax authorities, auditors and accountants, legal consultants and external legal consultants, service providers, suppliers, agents, business partners, financial and business advisors, file storage companies, archiving and/or records management companies, cloud storage companies, delivery couriers, IT companies who support our website and other business systems and so on.

### **Security for your Personal Data**

VNN uses appropriate administrative, technical, personnel, and physical measures to protect your personal data. Authorized personnel and third-party service providers may have limited access to your personal data, and they will only process your data according to our instructions.

We also have a data breach procedure in place, and we commit to notify you and the competent authority for any breach or suspected personal data breach where we are obliged by the law to do so.



## **Data Retention**

We will retain your personal data for as long as necessary, to fulfil the purposes we collected it for, and to comply with regulatory or statutory obligations.

The criteria to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the services to you.
- Whether there is a legal obligation to which we are subject.
- Whether retention is advisable considering our legal position (such as, litigation or regulatory investigations)

## **Your Legal Rights**

You have the following rights in relation to your personal data.

### **You have the right to:**

- (i) Request access to your personal data;
- (ii) Request correction of your personal data;
- (iii) Request erasure of your personal data ("right to be forgotten") where its process is of no further use or interest;
- (iv) Object to processing of your personal data;
- (v) Request restriction of your personal data;
- (vi) Request transfer of your personal data;
- (vii) Rights related to profiling (against decisions made solely by automated means without human intervention);
- (viii) Request withdrawal of the consent that you gave us.

If you would like to exercise any of your rights, please contact our Data Protection Officer by sending an email to: [dpo@vnnlabs.com](mailto:dpo@vnnlabs.com) and submit the relevant request. We will respond as soon as possible, but no later than 30 days.

You also have the right to lodge a complaint any time to the Cyprus Supervisory Authority, the Office of the Commissioner for Personal Data

([https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/page1i\\_en/page1i\\_en?opendocument](https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/page1i_en/page1i_en?opendocument)).

We would appreciate the chance to deal with your concerns and address your queries before you approach the Supervisory Authority.

## **Changes to the Privacy Policy**

This version was last updated on 26/08/2024. This Privacy policy may be amended from time to time without notice. We do, however, encourage you to review this statement periodically so as to always be informed about how we are processing and protecting your personal information.