

**This policy is effective from
25th May 2018**

1. INTRODUCTION

This privacy policy describes what personal data we collect, how we do that and why we need to. It sets out how we use personal data, who we disclose it to, how we manage transfers of personal data outside of Europe and what we do about data security. It will inform you about how the law protects you.

2. WHO DOES THIS PRIVACY POLICY APPLY TO?

This privacy policy applies to personal information we obtain and use from the following categories of individuals as a result of certain trading and/or website activities:

i. Website Activity:

- | |
|--|
| <ul style="list-style-type: none"> Those who access and use any of our websites (including use of online or mobile tools and apps, completion of enquiry forms, surveys or promotions). |
| <ul style="list-style-type: none"> Those who create a customer profile or who use our customer relationship and billing portal applications and tools. |
| <ul style="list-style-type: none"> Those who sign up to newsletters or receipt of other information from us. |
| <ul style="list-style-type: none"> Those who register for events or download resources. |

Note: Our websites are not intended for children and we do not knowingly collect data relating to children.

ii. Trading Activity:

- | |
|---|
| <ul style="list-style-type: none"> The points of contact for our customers, suppliers, service providers, partners and resellers. |
| <ul style="list-style-type: none"> Our agents where they are individuals. |
| <ul style="list-style-type: none"> The customers and end users of the communications services, equipment or technical and engineering support we provide (for example crew members) and our communications with them, including those who make support requests. |
| <ul style="list-style-type: none"> Those applying for a career with NSSLGlobal group of companies. |

References in this privacy policy to **'you'** and **'your'** is to an individual from the above two activities for who we hold and process some of their personal information.

Privacy Policy for **NSSLGlobal** Group

3. IMPORTANT INFORMATION AND WHO WE ARE

- a.** Your personal data is ultimately controlled by NSSLGlobal Limited, a company registered in England and Wales with registered number 3879526 and registered office 6 Wells Place Gatton Park Business Centre Redhill Surrey RH1 3DR UK. NSSLGlobal Limited is made up of different legal entities, details of which can be found here <http://www.nsslglobal.com/offices>
- b.** This privacy policy is issued on behalf of the NSSLGlobal Group so when we mention "NSSLGlobal", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the NSSLGlobal Group responsible for processing your data.
- c.** We have appointed a data protection officer (DPO) and Group Privacy Manager who is responsible for overseeing questions in relation to this privacy policy. Contact details: Sara Gordon, Data Protection Officer and Group Privacy Manager, NSSLGlobal Limited, email: sara.gordon@nsslglobal.com, address as above.
- d.** We have local privacy managers in our other countries of operation and we can provide their contact details within 24 hours of receiving a request to do so.
- e.** You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or the equivalent regulator in our other locations. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. WHAT ARE THE DATA PROTECTION PRINCIPLES?

We will comply with data protection law and in particular GDPR. We will ensure that the personal information we hold about you will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

5. YOUR DUTY TO INFORM US OF CHANGES AND ENSURE YOU HAVE PERMISSION

- a.** It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
- b.** If you are providing us with personal information of another person in relation to our products and services, the privacy policy will also apply to them. We may feel the need to ask you to confirm to us that you have obtained the permission of the other person (who is the data subject for data protection law purposes).

6. WHAT PERSONAL DATA MAY WE COLLECT ABOUT YOU?

Privacy Policy for **NSSLGlobal Group**

- a. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or information about companies or organisations.
- b. The sort of personal information we may collect from you in our Website Activity or Trading Activity may include:

Identity Data:	<ul style="list-style-type: none"> Name, username or similar identifier, title Marital status Date of birth and gender Photographs and CCTV footage (if you visit one of our offices) Proof of identification (copy passport, driving licence or national ID card)
Contact Data:	<ul style="list-style-type: none"> Billing address, delivery address Email address, fax and telephone numbers, including direct dial and mobile. Business Card
Financial Data:	<ul style="list-style-type: none"> Bank account and payment card details.
Transaction Data:	<ul style="list-style-type: none"> Details about payments and orders from you and products and services you have purchased from us. Your emails to us and our response Telephone calls which may have been recorded in our customer care team or for training purposes.
Technical Data (website or services):	<ul style="list-style-type: none"> Call records and location data. Internet Protocol (IP) address, your login data, browser type and version Time zone setting and location Browser plug-in types and versions Operating system and platform and other technology on the devices you use to access our websites, online applications and tools.
Profile Data:	<ul style="list-style-type: none"> Username and password, credentials, your interests, preferences, feedback and survey responses.
Usage Data:	<ul style="list-style-type: none"> Information about how you use our websites and our products and services.
Marketing and Communications Data:	<ul style="list-style-type: none"> Your preferences in receiving marketing from us and our third parties Your communication preferences.

- c. We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature, customer applications or tool. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with our websites, customer applications or tools.
- d. We do not collect any Special Categories of Personal Data about you (this includes details about your race, ethnicity, religious or philosophical beliefs, sex life, sex orientation, political opinions, trade union membership, health information or information about criminal convictions and offences) via our Website Activity or Trading Activity.
- e. **If you are looking to apply for a position with NSSLGlobal, then our Data Protection Policy for Employees, Workers and Contractors will apply and this gives you more specific information about the information we**

collect and how we use it in the recruitment process and employment relationship – a copy of which is available from HR@nsslglobal.com

7. WHAT HAPPENS IF YOU FAIL TO PROVIDE PERSONAL DATA?

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

8. HOW DO WE COLLECT YOUR PERSONAL DATA?

a. We use different methods to collect data from and about you including through:

i. **Direct interactions.**

You may give us your personal information by both Website Activity and Trading Activity.

ii. **Automated technologies or interactions.**

As you interact with our website and online applications and tools, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

iii. **Third parties or publicly available sources.**

We may receive personal data about you from various third parties analytics providers such as Google based outside the EU.

iv. **Contact, financial and transaction data from providers of technical, payment and delivery services (for example Paypal or DHL).**

b. The personal data which we hold may not have come to us directly from you as the data subject. Instead it may have been supplied or made available to us by an end user, client or supplier of our services and equipment (for example you may be a crew member and your employer, our client may have provided you with).

In such a situation:

- i. they will be the data controller and it is their responsibility to ensure they have complied with GDPR and data protection laws in how and why they have obtained your personal data and that you are fully aware of how that personal data will be shared with us;
- ii. we will comply with the provisions of this privacy policy in our capacity as the data processor;
- iii. they, as data controller are responsible for ensuring the security and robustness of your personal data as it is transmitted, transferred or made available to us;

9. HOW DO WE USE YOUR PERSONAL DATA?

Privacy Policy for **NSSLGlobal** Group

We will only use your personal data when the law gives us a legal basis to do so. Most commonly, we will rely on one of three lawful reasons under data protection law when we use your personal data:

- a. **In order to perform a contract.** Where we need to perform and manage the contract we are about to enter into or have entered into with you or in respect of which you will be the recipient of the services or equipment we provide (for example if your employer provides you with communications equipment and service we in fact provide).
- b. **Legitimate business interests.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c. **Legal or regulatory obligation.** Where we need to comply with a legal or regulatory obligation. For example we may, under investigatory powers legislation; we may have to share personal data about you to government and law-enforcement agencies.

Generally we do not rely on consent as a legal basis for processing your personal data.

You have the right to withdraw consent to marketing at any time by enquiries@nsslglobal.com

10. WHAT DO WE USE YOUR PERSONAL DATA FOR?

- a. We use your personal information for:

General communications

- To respond to website enquiries (including your completing a contact form).
- To deal with enquiries and communications we have with you, whether by email, telephone, post or in person.

Relations with Suppliers, Resellers, Service Providers and Agents

- To enter into and manage contract negotiations and tender responses.
- To manage and fulfil our contract obligations.
- To manage our business relationship generally.

Relations with Customers and the End User

- To administer or perform any obligations we have with our customers under a contract.
- To register new customers or new users of services we may provide.
- To provide technical help and customer or product support, including providing software and program updates and user guidance documentation.
- To provide product or service information messages (for example scheduled maintenance or technical issues may require this).
- To contact the appropriate person to manage installation, activation, technical support or engineering visits.
- To share information with a supplier if the individual is receiving services from them via us.
- To enable, manage and respond to online customer portal activity.

Privacy Policy for **NSSLGlobal** Group

- To make suggestions and recommendations to customers and prospects about our business contacts about goods or services that may be of interest to them via their points of contact.

Business Administration

- To manage and deal with billing or other service related dispute or issues.
 - To manage payment of our invoices and charges and to collect debt.
 - To operate and manage our business effectively.
 - Detect and prevent fraud, money laundering, code of conduct issues (bribery and corruption) and criminal activity where our business, or our products, equipment or services are being used or implicated.
 - To protect the vital interests of individuals where necessary.
 - To run credit and where appropriate, background checks.
 - Secure and protect our network.
 - To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
 - To manage our office locations and facilities (including safeguarding through access controls, visitor sign-in and CCTV monitoring).
 - To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
 - To manage our relationship with our business contacts which will include:
 1. Notifying them via one or more named individuals about changes to our terms or privacy policy
 2. Asking our named contacts to undertake a review or take a survey
- b. Note that we may process personal data for more than one lawful ground depending on the specific purpose for which we are using such data.
- c. Please *contact* enquiries@nsslglobal.com if you need details about the specific legal ground we are relying on to process your own personal data where more than one ground has been set out in the table below.

11. PROMOTIONAL OFFERS FROM US & THIRD PARTY MARKETING

- a. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing. If our ability to contact you is dependent on your consent, you have the right to withdraw your consent at any time. You do this by contacting us and updating your marketing preferences.
- b. We will get your express opt-in consent before we share your personal data with any company outside the NSSLGlobal group of companies for marketing purposes.
- c. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.
- d. Opt-outs will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Privacy Policy for **NSSLGlobal** Group

12. WEBSITE SPECIFIC POINTS - THIRD-PARTY LINKS & COOKIES

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

13. CHANGE OF PURPOSE

- a. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at enquiries@nsslglobal.com
- b. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- c. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

14. WHO DO YOU DISCLOSE MY PERSONAL DATA TO?

- a. Our Website Activity or Trading Activity may mean we need to share your personal data:
 - i. between companies in the NSSLGlobal group;
 - ii. with professional advisers lawyers, bankers, recruitment/HR, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to NSSLGlobal;
 - iii. if you are a customer or End user of one of our service providers, we may need to share your information with the applicable service providers, resellers and suppliers in connection with ensuring we are able to provide the contracted equipment, products or services or deal with product or service related matters as they arise;
 - iv. with tax authorities, regulators and other authorities or equivalent in other countries, who require reporting of processing activities in certain circumstances.
- b. We may disclose your personal data to third parties in the event we sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners will have the same rights and responsibilities as set out in this privacy policy.
- c. Except as set out in this privacy policy, NSSLGlobal will not otherwise disclose your personal data without your permission unless we are legally entitled or required to do so, or if we believe such action is necessary to protect and/or defend our rights, property or the vital interests of individuals.

Privacy Policy for **NSSLGlobal Group**

- d. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

15. DO YOU TRANSFER MY PERSONAL DATA INTERNATIONALLY?

- a. We share your personal data within the NSSLGlobal Group. This may involve transferring your data outside the European Economic Area (EEA) as a number of our locations are outside of the EEA, such as Singapore and the USA.
- b. A number of our external third parties (for example our suppliers or service providers) are based outside the EEA or may have their data servers based outside of the EEA so their processing of your personal data will involve a transfer of data outside the EEA.
- c. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - i. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission guidance on adequacy of the protection of personal data in non-EU countries. This guidance includes USA as having an adequate level of protection;
 - ii. Where we use certain third party providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries;
 - iii. For providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

16. WILL YOU KEEP MY PERSONAL DATA SECURE?

- a. Yes. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- b. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

17. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

- a. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Privacy Policy for **NSSL**Global Group

- b.** To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- c.** By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for not less than six years after they cease being customers for tax purposes.
- d.** In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

18. WHAT ARE MY LEGAL RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the appropriate data privacy manager with the NSSLGlobal group company you deal with or receive services from.

We may need specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

In some instances there may be an exemption or other reason under data protection law why we cannot deal with your request – if this is the case, we will write to you and set out the reasons and basis for our decision.