

# Privacy Notice

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# 1. Introduction

Gentrack Group Ltd. and its affiliates (“**Gentrack**”, “**we**” or “**us**” or “**our**”) respects your privacy and recognises the importance of protecting any personal data that we may hold. This notice (“**Privacy Notice**”) sets out our policies and principles regarding the use of personal data that you may provide. It also outlines how we use personal data that we may receive from third parties.

This Privacy Notice does not apply when we process personal data of individuals on behalf of our customers as a “data processor”. When we collect personal data from a Gentrack customer, we do so on their behalf, solely to assist them in providing you with products and services. We do not use this personal data for our own purposes. Such data is processed in accordance with the terms of our contract with our customers.

This Privacy Notice also does not apply to the personal data of our employees, which is governed by separate internal policies.

## 2. How We Collect Personal Data

### 2.1. Personal data we collect directly from you

<b>Category</b>	<b>Personal Data Collected</b>
When you interact with our website	Contact information* when you submit web forms or interact with our websites, for example requesting a demo or subscribing to news updates. When you interact with us, we may also collect usage data. Usage data includes metrics and information regarding your use and interaction with our website.
When you use our software applications as an employee or representative our customer	Contact information* or any other personal data related to you or your employer’s business relationship with Gentrack or any other personal data that your employer may provide as part of utilising Gentrack’s products, services and offerings. We may also collect usage data. Usage data includes metrics and information regarding your use and interaction with our applications and services.
When you apply for a job with us	Contact information* and any other information provided by you as a prospective candidate on your curriculum vitae (CV), résumé, cover letter, and application forms.
When you use our services	Contact information*, usernames, passwords, profile pictures, and tokens.
When you are a supplier or a vendor providing services to us	Contact information*, bank account details, payment information, and billing records necessary for processing payments.
When you visit our offices	CCTV footage at entry and exit for security purposes, as well as basic information like name and picture for the entry pass or as updated on the visitor management software.

*\*Contact information may include name, job title, company name, address, phone number, email address, other information you have voluntarily chosen to share*

## 2.2. Personal data we collect from other sources

We collect certain information about you automatically when you use our website with cookies. Cookies allow us to record certain information about you when you use our website, including details of your domain name, IP address, operating system, and browser. This helps us to understand your use of this website and enable the monitoring and improvement of the site to optimise your experience. If you would prefer to block cookies, please refer to the instructions or help service on your internet browser. Please also refer to our [Cookie Policy](#).

When using our website, you may be directed to other sites that are beyond our control and there are links to other sites outside our service. We are not responsible for these sites, and you should read the privacy statements of any new site you visit.

## 3. How We Use Personal Data

We process your personal data when you have given consent, or for fulfilment of a lawful contract or when Gentrack is of the opinion that processing of personal data is necessary for the purposes of legitimate interests of the organisation such as:

- To provide services and support our IT solutions, manage customer relationships, and ensure compliance with contractual obligations including customer support;
- To facilitate security, fraud prevention, performance monitoring, business continuity and disaster recovery;
- To evaluate suitability for employment, communicate during the recruitment process, and keep records of applications;
- General management and reporting purposes, such as invoicing, processing payments and account management;
- To manage investor relations, fulfil regulatory requirements, and communicate regarding financial performance along with processing dividend payments, managing proxy voting, and providing access to shareholder resources;
- To ensure the security and safety of our premises, employees, and visitors, and to manage visitor registration and access to our facilities;
- To enhance website functionality, personalize user experience, and analyse website usage;
- To send newsletters, promotional emails, market research, telecom marketing;
- For research and development of new products and services.

### Direct Marketing

Excluding personal data we collect from visitors (who visit our offices) and prospective candidates, we may use your personal data for direct marketing purposes.

We will provide you with a choice to opt-out of any of our marketing communications. We will respect your request to decline to receive these marketing communications however we may continue to use your contact details to provide you with important information, such

as changes to this Privacy Notice or if we need to tell you something to comply with any regulatory obligations.

## 4. How We Share Your Personal Data

We may share your personal data with the following parties:

- **Group companies:** Other companies within the Gentrack group for the purpose stated earlier.
- **Service Providers:** Service providers acting as processors who provide IT and system administration services, subcontractors or agents for providing services to you and for the purposes that we specify. Where a service provider is used for these specified reasons, your personal data is transferred only where there is a need to do so, and such service providers have agreed to maintain the confidentiality and security of information, including any personal data, that we share with them and will adhere to relevant data protection laws.
- **Statutory or regulatory obligations:** to the extent necessary to fulfil legal, statutory or regulatory requirements
- In the event of a **sale, merger, or acquisition** of our company, or during a dissolution, liquidation, administration, receivership, or other form of insolvency, you agree that your personal data that is collected by us may be disclosed to and transferred to the prospective buyer, transferee, insolvency practitioner or other relevant third parties involved in the transaction. These actions are taken to ensure continuity of service and to comply with legal and regulatory obligations.
- We may disclose your personal data in response to **lawful requests by public authorities**, including to meet national security or law enforcement requirements. Such disclosures will only be made when necessary and in accordance with applicable laws and regulations, ensuring that your personal data is fully protected possible while complying with governmental or regulatory obligations.
- **We will not** sell, distribute, lease or share your personal data to third parties unless we are required to do so by law, a regulator, rules of applicable stock exchange or during the course of legal proceedings.

## 5. Where Is Your Data Transferred

### 5.1. Transfers within Gentrack group

Your personal data may be transferred to, stored, and processed by entities within the Gentrack group that are in the countries outside of your country of residence, including but not limited to the United Kingdom (UK), Australia, New Zealand, Singapore, the European Economic Area (EEA), Kingdom of Saudi Arabia, Israel, and India. These internal transfers amongst the group of companies are governed by data processing agreements (DPA)/ standard contractual clauses (SCCs) or similar intra-group agreements which ensure that your personal data receives an adequate level of protection, regardless of where it is processed. We ensure that your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

## *5.2. Transfer from the European Economic Area (EEA) and the UK to other countries*

Some of our service providers that provide services to us under a contract are in countries that may not have privacy and data protection laws equivalent to those in your country of residence. For personal data transferred outside the EEA and UK to countries without an adequacy decision, we undertake necessary transfer impact assessments. We protect your personal data by using model contracts approved by the European Commission and the UK ICO where necessary, ensuring it receives the same level of protection as in Europe and the UK.

## *5.3. Transfers from outside European Economic Area (EEA) and the UK to other countries*

We may transfer your personal data to service providers operating in other jurisdictions for the purposes specified by Gentrack and only for the reasons stated above. Before any such transfer, we ensure that these service providers have appropriate safeguards in place to protect your personal data in compliance with applicable data protection laws. Additionally, we ensure that the received party has both contractual obligations and necessary technical and organizational measures in place.

## **6. How We Secure Your Personal Data**

Gentrack is an ISO/IEC 27001:2022 certified organisation.

At Gentrack, we are committed to safeguarding your personal data against all internal and external threats, whether deliberate or accidental, as well as unauthorised disclosure, access and other forms of unlawful processing. We implement reasonable, technical and organisational controls to secure your personal data.

In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who are bound by confidentiality and only on a need-to-know basis.

## **7. What Are Your Privacy Rights & Choices**

Depending upon your location and in accordance with applicable laws, you may have certain rights regarding the Personal Data we collect or maintain about you. Please note these rights are not absolute and are governed by applicable law in the jurisdiction you are located. You may have the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request to transfer/port your personal data.

- Right to withdraw processing of personal data from automated individual decision-making, including profiling
- Withdraw consent at any time where we are relying on consent as a lawful basis to process your personal data.

If you wish to exercise any of the rights set out above, please contact us at [dataprivacy@gentrack.com](mailto:dataprivacy@gentrack.com)

If you are from the European Union (EU) or the European Economic Area (EEA) then you have the right to complain to a data protection authority about any violation under General Data Protection Regulation (GDPR). Contact details for data protection authorities in the EEA are available [here](#). You can exercise these rights by contacting the data protection authority in the country where you reside, where you work, or where the alleged infringement occurred.

## 8. How Long Do We Keep Your Personal Data

When information is no longer required for business purposes, it shall be retained in line with legal, regulatory, or contractual requirements. Where the retention threshold has been met, it shall be destroyed in a manner commensurate with the classification and sensitivity of the data to ensure there is no possibility of compromise.

## 9. Data Protection Officer

If you have any questions about this Privacy Notice or our privacy practices including any requests to exercise your privacy rights, including any access to this notice in a different format, please contact the Data Protection Officer (DPO) by emailing us at [dataprivacy@gentrack.com](mailto:dataprivacy@gentrack.com)

You may also contact us by postal mail at:

**Gentrack Data Protection Officer,**

203 Eversholt Street, London, NW1 1BU

When you contact us, please indicate in which country and/or state you reside.

## 10. Other Important Privacy Information

### 10.1. Disclaimer

By providing your personal data to us, you consent to us processing your personal data in the manner set out in this Privacy Notice and you accept that Gentrack will take reasonable steps to ensure those recipients comply with the necessary data protection legislations.

## *10.2. Children's Privacy*

Gentrack does not knowingly or intentionally collect personal data about children below the age of 18. If you believe that we have collected Personal Data about a child under 18 then kindly let us know and we will take steps to delete such information.

## *10.3. Changes to Privacy Notice*

Gentrack may make amendments to this Privacy Notice at any time for any reason. We will publish any updated Privacy Notice on our website.