Partner Admin Center Privacy Policy

Learn what information Simplanova collects and processes about our Partner Admin Center users

MB "Simplanova" (hereinafter – Simplanova) respects individual privacy and is committed to protecting and maintaining the confidentiality of personal information collected through the Partner Admin Center. This Partner Admin Center's Privacy Policy describes how and why Simplanova processes personal information about you when you visit Simplanova's Partner Admin Center or use the services provided by this Partner Admin Center.

How we collect your information?

Simplanova collects your personal information via:

- Partner Admin Center portal
- Cookies (you can find out more about cookies used on our website in cookie policy: https://simplanova.com/about-us/our-cookie-policy/)

What information do we collect?

Simplanova collects and processes the following information about you:

- information that Microsoft Partner representatives voluntarily provide:
 - 1) name and surname
 - 2) email address
 - 3) company name
- data of Client's customers' fetched via API from Microsoft Admin Center or entered by the Microsoft Partner:
 - 1) Customers' company name entered by the Partner, domain email address.
 - 2) Data that can read in Microsoft Admin Center, such as but not limited to environment name, localization, database size.

Use of personal information

We process personal information collected via the Simplanova Partner Admin Center for:

• Running the Partner Admin Center so that the Microsoft Partners can manage their Customers' environments.

Cookies

We may also obtain information about your general visit to our Partner Admin Center using Cookies or other tracking technologies, which enable us to make certain parts of the Partner Admin Center easier to use and improve the Partner Admin Center's functionality. Please see our Cookie Policy for more information.

Legal basis

Your information may be collected and processed on the following legal bases:

- It is necessary to pursue our legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms, (GDPR Article 6 (1) (f)
- It is necessary for performing the contract we have with you (GDPR Article 6 (1) (b)

Sharing of personal information

We do not share personal information collected via Simplanova's Partner Admin Center with third parties. However, personal information may be shared with third parties where one of the following circumstances applies:

- You have consented to us doing so
- We are under a legal, regulatory, or professional obligation to disclose your personal information or to protect the rights, property, or safety of our company, our clients, or others
- Our company is merged or acquired by a third party, in which case your personal information may form part of the transferred or combined assets
- We are using a third-party service provider to provide data processing services

When disclosing your personal information to third parties that will process it on our behalf, we will obtain assurances from these third parties that they will safeguard personal information consistently with this Partner Admin Center privacy policy.

Where we have knowledge that such third party is using or disclosing personal information in a manner contrary to this Policy, we will take reasonable steps to prevent or stop the use or disclosure. In addition, Simplanova holds these third parties accountable for maintaining your trust in the company through documents such as Non-Disclosure Agreements.

Do you transfer information about me outside the European Economic Area?

Information outside the European Economic Area (all member states of the European Union and Iceland, Liechtenstein and Norway) **is not transferred**. We store it in Azure Data Centers located in North Euroope.

There are some exceptions set out in the Cookie policy that may apply.

How long do we store your personal information?

We will keep your personal information as long as we need it for the abovementioned purposes. This period will vary depending on the nature of your interactions with us.

Security

We maintain reasonable safeguards to protect against unauthorized disclosure, misuse, alteration, or destruction of the personal information you provide to us through our website. We protect data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies containing our confidential information, including your personal information.

Electronic security measures continuously monitor access to our servers and protect them from hacking or other unauthorized access from remote locations. This protection includes firewalls, restricted access, and encryption technology.

Please note, however, that perfect security does not exist on the Internet. Therefore, while we endeavor to protect your personal information, unauthorized parties may access and use data when data is transferred over the Internet.

Processing of sensitive information

Sensitive information is information about your health, racial or ethnic origin, political views, religious or philosophical beliefs or membership in trade unions, genetic or biometric data or sexual orientation. We do not collect or process sensitive information about you and we ask you not to provide us any sensitive information.

Are you making automated decisions? Are you profiling?

We do not make automated decisions regarding you, you are not profiled.

Your rights

You have certain rights about your personal information:

Right to access: you have the right to request access to any data that can be considered your personal data. This includes the right to be informed on whether we process your personal data, what personal data categories are being processed by us, and the purpose of our data processing;

Right to be informed: you have the right to be informed about processing of your personal data and such information has to be easy to understand. This right is executed with this privacy policy;

Right to rectification: you have the right to request that we correct any of your personal data if you believe that it is inaccurate or incomplete;

Right to object: you are entitled to object to certain processing of personal data, including for example, making automated decisions based on your personal data or when we otherwise base the processing of your personal data on our legitimate interest;

Right to restrict personal data processing: you have the right to request that we restrict the processing of your personal data if you wish to: (i) object the lawfulness of the processing; (ii) fix unlawful processing of personal data; (iii) receive or avoid deletion of personal data for establishing or defending against legal claims; or (iv) demand restriction of the processing until assessing the plausibility of Simplanova's legitimate interest in the specific processing activity;

Right to erasure: you may also request your personal data to be erased if the personal data is no longer necessary for the purposes for which it was collected, or if you consider that the processing is unlawful, or if you consider that the personal data has to be erased to enable us to comply with a legal requirement;

Right to data portability: if your personal data is being automatically processed with your consent or on the basis of a mutual contractual relationship, you may request that we provide you that personal data in a structured, commonly used and machine-readable format. Moreover, you may request that the personal data is transmitted to another controller. Bear in mind that the latter can only be done if that is technically feasible; **Right to withdraw your consent:** in cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time without any adverse effect;

Right to submit your claim with the supervisory authority: if you are not satisfied with our response to your request in relation to personal data or you believe we are processing your personal data not in accordance with the law, you can submit your claim with the supervisory authority in your country of residence or to the lead supervisory authority – the Lithuanian State Data Protection Inspectorate at <u>www.ada.lt</u>.

However, note that these rights are not absolute, and even if you exercise these rights, we may need to retain certain information for legal or administrative purposes.

If you would like to exercise any of the rights above, please email <u>sales@simplanova.com</u> and include a request signed with electronic signature to help us prevent unauthorized individuals from accessing, changing, or deleting your information. Simplanova has the right to contact the data subject with a request to provide additional information that is necessary to determine his identity. We will respond to your request as soon as practically possible.

Updates of privacy policy

We review and update this Partner Admin Center privacy policy once a year or more often if it is needed. When we do so, we will publish the changes on our website. If you disagree with these changes, please do not continue using our Partner Admin Center.

Updating your information

If your personal details (such as your name or email address) change, we kindly ask you to inform us as soon as possible via email to sales@simplanova.com.

Contact Details

You can email your inquiries or any other questions or concerns to <u>sales@simplanova.com</u> or by post to our office address below. We will investigate and attempt to resolve any questions, complaints, or disputes regarding using and disclosing personal information by the principles of this Web privacy policy.

MB "Simplanova" Company code: 303028709 Address: Verkiu str. 34B, LT-08221 Vilnius Email: info@simplanova.com Phone: +370 60814442

If you have any questions regarding personal data processed by Simplanova, you can contact the responsible person directly via email to <u>sales@simplanova.com</u>

This privacy policy was last updated on 2023 September 8th.