


# Privacy Notice

*Last updated: April 2024*

**What is this document?** We have developed this privacy notice to publicly disclose all relevant aspects of our personal data processing activities to ensure compliance with our legal obligations relating to transparency, particularly those under the [GDPR](#).

**What does Datenna do?** We are on a mission to support critical decision-making for national and economic security purposes globally, hoping to foster global stability, peace, and prosperity with Open-Source Intelligence (OSINT). This is made possible with the unique combination of Datenna's profound regional expertise and ground-breaking technology — which often entails the processing of personal data.

We are aware of the importance of the fundamental rights to privacy and to the protection of personal data in the pursuit of peace and global stability. Our overarching mission is driven by the goal of making the world more transparent, and it is in this context that we aim to be transparent ourselves about our practices involving personal data and which are necessary for our success.

**How to use this document:** This notice is intended to empower individuals to not only understand their rights, but also to hold us accountable for our data practices. For ease of reference of anyone reading this, this notice is divided among  the sections listed below. **If you have any questions about the information contained in this notice, please feel free to reach out to us using the [Contact information](#) provided at the bottom of this page.**

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## 1. Who this notice is for

This notice applies to most of the activities involving personal data at Datenna. However, it neither covers Datenna's activities involving data of its employees and other internal collaborators, nor the company's processes relating to the recruitment of personnel.

Datenna's employees and other collaborators may refer to the relevant internal documentation made available to them, while individuals applying for a job at Datenna may refer to the notice dedicated to our recruitment processes, available [here](#).

### **This privacy notice applies to you...**

- When you browse Datenna's website, including when you submit forms to request access to certain content (such as special reports or a platform demo) or to contact our team;
- When you use social media or other publicly accessible platforms (for example, [X](#) and [LinkedIn](#)) and either engage with Datenna (such as by reacting to Datenna content) or mention Datenna in your own content;
- When you sign up for and attend events organised by our team;
- When you visit our offices, including when you connect to Datenna's WiFi networks;
- If you are a journalist or other media professional with whom we (might) communicate as part of our public relations efforts;
- If you are an academic or researcher with whom we (might) collaborate on research projects;
- If you are a representative of one of our customers or a user of our OSINT platform;
- If you are a representative of an organisation which we might consider to be a business lead or prospect, including when you provide your business card to our team at events;
- If you are a representative of (prospective) vendors, service providers, and other organisations with whom we (might) collaborate; and
- If you are an individual about whom we collect information made public (and which we use for the purposes of operating our OSINT platform), such as a shareholder, an executive, or other representative of an organisation; a researcher involved in published research initiatives; an inventor or another individual involved in published intellectual property rights application and registration processes; an individual who has appeared in a government-issued sanction list; or an individual with links to the categories of individuals listed above when information on such links are also publicly available.

For a more in-depth view of the scope of processing which might apply to your particular circumstance, please refer to the information included in the sections **Collection and processing of personal data** and **Purposes of processing and lawfulness** below.

## **2. Collection and processing of personal data**

Datenna processes a variety of categories of personal data to fulfil its legitimate business purposes. Depending on your relationship with us, different types of data may be processed,

and different collection methods may be employed. To provide you with a concrete contextual understanding, we have prepared the table below to summarise all this information in one place:

Who you are	Data we process	How we collect data
Website visitor	<ul style="list-style-type: none"> <li>Data you provide when filling out a form, such as your contact details, the organisation you represent, and your relationship with such organisation</li> <li>Include google analytics cookies</li> </ul>	<ul style="list-style-type: none"> <li>Your voluntary provision of data to us</li> <li>Automatically when you browse our website, for session-related data</li> </ul>
Attendee of an event organised by Datenna	Contact details and the organisation you represent	Your voluntary provision of data to us
Office visitor	<ul style="list-style-type: none"> <li>Contact details and the organisation you represent</li> <li>Information on the date, time, and purpose of your visit</li> <li>MAC address and host name of a device you connect to our WiFi networks</li> </ul>	<ul style="list-style-type: none"> <li>Your voluntary provision of data to us</li> <li>The creation of entries in our records relating to your visit</li> <li>Automatically for your connected devices' MAC addresses and host names</li> </ul>
Journalist or other media professional	Contact details and the organisation with which you are associated	<ul style="list-style-type: none"> <li>Automatically with support from services dedicated to public relations and media outreach</li> <li>Manual searches in publicly available media-dedicated sources</li> </ul>
Social media users	<ul style="list-style-type: none"> <li>Relationship with Datenna in the social media platform (e.g., engagement with Datenna's profile or content)</li> <li>Published content mentioning Datenna</li> </ul>	<ul style="list-style-type: none"> <li>Automatically with support from social media platforms' functionalities and brand management technologies</li> <li>Manual searches in the relevant services with a focus on Datenna-related content</li> </ul>

<b>Academic/researcher</b>	<ul style="list-style-type: none"> <li>• Contact details and the organisation with which you are associated</li> <li>• Published research initiatives with which you are associated</li> </ul>	<ul style="list-style-type: none"> <li>• Your voluntary provision of data to us</li> <li>• Our own manual, independent search for potential research collaborators using publicly available information</li> </ul>
<b>Representative of a customer</b>	<ul style="list-style-type: none"> <li>• Contact details, the organisation you represent, and your relationship with such organisation</li> <li>• Information about your experience with us and our products and services</li> </ul>	<ul style="list-style-type: none"> <li>• Your voluntary provision of data to us</li> <li>• The provision of data by your organisation to us</li> <li>• The creation of entries in our records for customer relationship purposes</li> </ul>
<b>Representative of a business lead or prospect</b>	<ul style="list-style-type: none"> <li>• Contact details, the organisation you represent, and your relationship with such organisation</li> <li>• Information on any contact or relationship established with our team</li> <li>• Professional information made publicly available by you on LinkedIn</li> <li>• Features and use cases of our products and services which might be of interest to you, or the organisation you represent</li> </ul>	<ul style="list-style-type: none"> <li>• Your voluntary provision of data to us</li> <li>• Our independent research on LinkedIn</li> <li>• The creation of entries in our records for marketing and sales purposes</li> <li>• The provision of data by the organiser of an event you have attended (if you have authorised the organiser to share your data)</li> </ul>
<b>Representative of a (prospective) business partner</b>	<ul style="list-style-type: none"> <li>• Contact details, the organisation you represent, and your relationship with such organisation</li> <li>• Professional information made publicly available by you on LinkedIn</li> <li>• Information on any contact or relationship established with our team</li> <li>• Information on products or services which you and your organisation might offer to Datenna</li> </ul>	<ul style="list-style-type: none"> <li>• Your voluntary provision of data to us</li> <li>• The provision of data by your organisation to us</li> <li>• Our independent research on LinkedIn</li> <li>• The creation of entries in our records for procurement and strategic partnership purposes</li> </ul>

Individual whose publicly available data is used in our OSINT platform	<ul style="list-style-type: none"><li>• Full name</li><li>• Positions held within organisations</li><li>• Percentage of shares held in organisations</li><li>• Amount of capital invested in organisations</li><li>• Details of published research projects, including field and funding received</li></ul>	Our collection of information made publicly available by lawful means in a variety of sources. Sources used for this purpose are limited to (1) publicly accessible websites of public entities, including universities, ministries, and other government branches, as well as (2) publicly accessible websites of private entities, including commercial data providers dedicated to compiling publicly available information on organisations, research initiatives, and public disclosures by government branches
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Please note that these are just examples of concrete uses cases that we might have for personal data relating to the categories of individuals listed in the **Who this notice is for** section of this notice. Depending on your particular circumstance, the information contained in this table might not apply, or only partly apply to you. If you would like to know more about your particular circumstance, you may confidentially submit a request to our Data Protection Officer using the **Contact information** provided at the bottom of this page.

 **Cookies and Automated Data Collection in our Website.** [Google Analytics, something else?].

**Users of our OSINT Platform.** Datenna is aware of the sensitive nature of the decisions being made by its customers based on intelligence derived from Datenna's OSINT platform. For that reason, and following our strict contractual commitments with our customers, on-platform activity of end-users of our OSINT platform are neither tracked nor logged by us in any form. We do not collect session-related information and do not analyse the history, behaviour, or patterns of use of information of our customers.

**Children, Adolescents, and Special Categories of Data.** We do not knowingly collect data relating to individuals under 16 years old. Additionally, we do not collect any data that falls under a special category of data under the GDPR, such as, for example, data concerning the health, racial or ethnic origin, or criminal convictions of individuals. If you are a parent or guardian of an individual under 16 years old, you have reason to believe that we might be processing data on such individual, and you want to exercise any of the rights that may apply in your particular case, please refer to the **Contact information** provided at the bottom of this page.

**3. Purposes and lawfulness of personal data processing**

Depending on your relationship with Datenna, we might have different reasons for which we need to process your personal data. In all cases, such reasons are related to one or more of the following purposes:

- Communicating with customers for support and account management purposes.
- Promoting and selling Datenna products and services, including where necessary to negotiate and conclude contracts.
- Sending invites to events organised or sponsored by Datenna, or other public events.
- Responding to communications received, including to provide access to requested Datenna resources.
- Communicating with representatives of (prospective) vendors, service providers and other strategic partners to discuss collaboration or business opportunities.
- Analysing the performance of our products, services, communications, and marketing campaigns.
- Gauging public reactions and impressions of Datenna, its products, services, events, and other initiatives.
- Managing our offices and maintaining the security of our physical and digital environments.

**Datenna's OSINT Platform.** The pursuit of our corporate mission relies primarily on the collection and further processing of publicly available information. This often requires us to process the categories of publicly available personal data relevant for our OSINT platform and mentioned in the **Collection and processing of personal data** section of this notice. In the context of our OSINT platform, such categories of personal data may be linked to and displayed in connection with non-personal data relating to organisations. This may be the case, for example, when an individual is formally linked to an organisation in a publicly available record — such as when the individual is a shareholder of that organisation.

All processing of personal data linked to the operation of our OSINT platform is strictly intended to support critical decision-making on national and economic security matters. This can be done, for example, with the identification of potential risks in these areas due to the revelation of relevant links between individuals, organisations, technologies, investments, research projects, and more. Datenna believes that processing the limited amount of personal data mentioned in this notice is justifiably necessary to achieve such purposes. To know more about how our customers may use personal data collected by means of our OSINT platform for their own purposes, please refer to section **Recipients of personal data** below.

Please note that data collected for the purposes listed in this section may also be used for secondary purposes, as long as any such secondary use is compatible with the original purpose. Examples of secondary uses of personal data collected for the purposes listed above include statistical analysis of data, improvement of existing processes to which the data relates, and organisational planning.

**Lawfulness of Processing.** Our processing of personal data is subject to appropriate legal scrutiny. We will only process personal data when we have asserted that the scope of our

intended processing is lawful. For the scope of the personal data processing outlined in this notice, Datenna relies on the following legal bases to justify the collection, use, and further processing of personal data for the purposes listed above:

- When you voluntarily provide personal data to us for specific purposes informed to you, we will process that data for those purposes based on **your consent**. Whenever this is the case, you are free to withdraw your consent. To learn about how you can do this, please refer to the **Your rights and choices** section of this notice.
- When personal data is necessary for us to fulfil obligations or exercise rights in the context of a contract with you, or when personal data is necessary to enter into a contract with you, we will process your personal data for the purposes our **performance of a contract** or of **necessary preliminary steps to enter into a contract**, respectively.
- When the laws and regulations in force mandate us to process certain personal data for expressly defined purposes, we will process the necessary personal data **to comply with the relevant legal or regulatory requirements**.
- When we assess that certain personal data is necessary for important, compelling, lawful, reasons that are either in our interests, or those of third parties reasonably connected to our overarching objectives, we will process the relevant personal data **to pursue legitimate interests**.

**Legitimate Interests and Your Rights.** Activities based on legitimate interests rely on proportionate uses of personal data to benefit Datenna, our customers, you individually, and other third parties (individually or combined). Examples of legitimate interests pursued with our processing activities include the projected outcome of activities which require a limited portion of personal data to:

- Operate our OSINT platform, through which we enable our customers to identify potential risks in the areas of national and economic security.
- Gauge the impressions of the public on Datenna and its initiatives, to better guide our decision-making processes to improve the company and its endeavours.
- Maintain the security of our physical and digital environments, allowing us to safeguard all information, propriety and other assets owned or otherwise held by Datenna.

We generally do not consider that there are legitimate interests to process personal data if fundamental rights and freedoms of an individual override the interests at stake. We assess this by doing a balancing test (between the interests pursued and the fundamental rights and freedoms potentially affected) following guidelines issued by the competent authorities, including the *Autoriteit Persoonsgegevens*.

Depending on your particular circumstances, you may have grounds to object to our processing of your personal data based on legitimate interests pursued by us or others. To understand how you can exercise the right to object, please refer to the **Your rights and choices** section of this notice. If you want to know more about our use of personal data for legitimate interests, please feel free to reach out to us using the **Contact information** at the bottom of this page.



## 4. Recipients of personal data

Datenna shares personal data with third parties only when such sharing is necessary for the fulfilment of the legitimate purposes outlined in this notice. Whenever we share personal data with service providers, vendors or other third parties acting on our behalf, we ensure that a contract is put in place with the relevant party to apply strict confidentiality and data protection provisions according to the applicable legal requirements. As a rule, third parties acting on our behalf (for example, to provide a service), are only authorised to process personal data controlled by us according to our instructions and only for the limited purposes of the services in question. Personal data is neither sold nor provided to third parties without a legitimate reason.

**Recipients of Personal Data for Datenna's Purposes.** To support our operation, provide critical data processing and other specialised services and assets, Datenna may share portions of personal data with the following categories of third parties:

- Providers of cloud computing, data storage and processing services.
- Providers of customer relations management software.
- Providers of services relating to the operation and maintenance of our website and its functionalities, including website analytics tools.
- Providers of information security tools and services, including those used to monitor suspicious activities in our website, OSINT platform, and other critical information assets.
- Law enforcement and other competent authorities in cases where we are legally required to provide personal data, including when we receive lawful requests for access to personal data (for example, in the course of an investigation by an authority).
- Other parties (such as consultants, legal advisors and the like) whenever we consider that sharing personal data is reasonably necessary to exercise rights or to protect the property or other compelling interests of Datenna, our employees, customers or other concerned third parties.

**Provision of Personal Data to Datenna's Customers.** The provision of publicly available information to customers is a core component of Datenna's overarching mission. Given the scope and purposes of Datenna's processing of personal data, the provision of publicly available personal data via our OSINT platform is considered necessary to achieve the objectives outlined in the section **Purposes of processing and lawfulness** above. This means that the limited amount of personal data contained in our OSINT platform is provided to our customers in the context of our performance of our service agreements with them. Such provision of data is crucial to allow them to make strategic decisions related to their own economic and national security endeavours.

Datenna's customers are independent controllers individually responsible for deciding on the purposes and means of their own processing of personal data. Our provision of personal data to customers are linked to the specific purposes outlined in this notice and reflected in our customer agreements. Datenna is not responsible for its customers' end use of the data



accessed via our OSINT platform. Decisions made by Datenna's customers on the processing of personal data is subject to the laws and regulations applicable to such customers, which might include special rules (and exemptions) relating to the processing of personal data carried out by governmental entities in the areas of national security, economic policy, and other related topics.

**Transfers of Personal Data Outside the EEA.** Although Datenna's operations are primarily concentrated within the European Economic Area (EEA), it is possible for personal data under our control to be transferred outside the EEA. This might occur, for example, where some of our service providers process a portion of the personal data we control in data processing facilities (such as servers) that are physically located outside the EEA.

Please note that the processing of personal data outside the EEA might be subject to the laws of other jurisdictions, which might result in a lower level of protection for personal data in comparison to the level guaranteed by the laws that apply in your jurisdiction.

Transfers of personal data outside the EEA under Datenna's control will only occur if they are strictly necessary for the purposes outlined in this notice, and if the transfers comply with the applicable laws. In practice, this means that transfers can only be carried out if at least one of the following applies:

- The European Commission has decided that the country of destination provides an adequate level of protection for personal data (see [here](#) for a list of such countries);
- A legally-binding document addresses all necessary requirements to authorise the transfer, such as Standard Contractual Clauses issued by the European Commission (see [here](#) for a copy of the clauses); or
- The transfer is permitted under applicable data protection laws due to another legally valid mechanism.

## 5. Data retention and erasure

Personal data is retained by Datenna only for the time during which it remains necessary for the fulfilment of the legitimate business purposes outlined in this notice. For example, for individuals attending events organised by us, we will delete data a few days after the occurrence of the event if no specific circumstance (for example, investigating an incident at the event) requires us to keep someone's data for a longer period.

We make continuous efforts to improve our data retention and erasure policies and procedures to ensure that different categories of data are given different treatment following a risk-based approach — primarily taking potential risks to the fundamental rights and freedoms of individuals into account. Furthermore, in cases where we are obliged to retain personal data to comply with specific legal or regulatory requirements, we take the necessary measures to ensure the prolonged retention of the relevant data to meet such requirements.

After personal data is no longer necessary for our legitimate business purposes or for legal purposes (such as legal compliance and the exercise of legal rights in case of disputes), data may be still stored for an additional minimal period in our backup environments for

operational and security purposes. After such period has lapsed, personal data that is no longer necessary is either securely and irreversibly destroyed, or anonymised so that it cannot be linked to the individuals to whom it originally related.

## 6. Security of processing

Datenna takes information security very seriously. We take appropriate measures to protect personal data from unauthorised access, use, disclosure, alteration, loss, and destruction. Only authorised personnel who have a need to know may have access to your data for the fulfilment of legitimate business purposes. We have implemented and continue to improve our security policies and controls to ensure that sufficient technical, physical, and organisational measures are in place with the purpose of providing an appropriate level of security for your data. Existing measures include encryption of personal data and enforcement of access controls in certain systems and environments, and other controls aimed at ensuring the ongoing confidentiality, integrity, availability, and resilience of our data processing systems.

We have procedures in place to swiftly respond to security incidents, including those potentially leading to personal data breaches. Such processes are recurrently subjected to testing and improvement cycles. In addition, we are prepared to take all necessary measures to disclose a security incident to the competent authorities and/or to potentially affected individuals in the event that we are legally required to do so.

## 7. Your rights and choices

We are committed to respecting the rights you have over your data. While we process your data for the purposes described in this notice and, depending on your particular circumstances, you have the right to request the exercise of the following rights:

- Access to your personal data
- Update or correction of your personal data
- Erasure of your personal data
- Objection to or restriction of our processing of your personal data, including in cases where we process your personal data based on a legitimate interest
- Withdrawal of any consent given for our processing of your personal data
- Transfer of your personal data to a third party selected by you

**Exercising Your Rights.** To request the exercise of any of the rights listed above, please send an e-mail to [privacy@datenna.com](mailto:privacy@datenna.com). Your request will be confidentially processed by our Data Protection Officer. Depending on the scope of your request and of your particular circumstances, we may have legitimate reasons not to process your request, or to process it only partially. Whenever this is the case, you will be informed accordingly.

If you are not satisfied with the information you receive after having contacted our Data Protection Officer, note that you also have the right to lodge a complaint with your local

supervisory authority (listed by jurisdiction [here](#)) or with Datenna's lead supervisory authority, the *Autoriteit Persoonsgegevens*, in the Netherlands ([here](#)).

## 8. Changes to this notice

We may update this privacy notice as needed to reflect changes in our internal processes, technologies, and generally to improve the information provided to you. Any changes will be effective immediately upon posting. If substantive changes with a potential to affect your rights and freedoms are planned and we have reasonable means of contacting you (for example, your e-mail address), we will communicate such substantive changes to you before we implement them into this notice.

## 9. Contact information

Datenna is a private organisation headquartered in The Netherlands, subject to EU and Dutch law. Our corporate identity and contact details are listed below:

*Datenna B.V.*  
*Keizersgracht 2*  
*5611 GD Eindhoven, The Netherlands*  
[info@datenna.com](mailto:info@datenna.com)

Datenna is the controller responsible for deciding the means and purposes of processing of personal data described in this privacy notice. If you have any questions or concerns regarding this privacy notice, our data practices, or your particular circumstances, you may confidentially contact our Data Protection Officer via e-mail at [privacy@datenna.com](mailto:privacy@datenna.com).

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