

## Vantage Towers Privacy Notice for Prospective Customers (B2B)

(Art. 13 and 14 of the General Data Protection Regulation (GDPR)) and Data Protection Act 2018 (No.7 of 2018)

Date: 25.02.26

This privacy notice applies when you, as a **prospective B2B customer**, contact Vantage Towers through the “**Get in Touch – Customers**” form on our website. When you submit the form, we collect and process your personal data in order to respond to your inquiry and assess your interest in becoming a Vantage Towers customer. If needed, you can access this privacy notice any time on our website here: <https://www.vantagetowers.com>. This privacy notice gets updated from time to time, so we would encourage you to check it regularly on our website.

### 1. Data Controller – who is responsible for data processing

Vantage Towers Limited

Address: Mountainview, Leopardstown, Dublin 18, Ireland

E-Mail: [info.ie@vantagetowers.com](mailto:info.ie@vantagetowers.com)

### 2. Contact our Group Data Protection Officer

Vantage Towers AG with the addition” To the Data Protection Officer“

Postal address: Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: [privacy@vantagetowers.com](mailto:privacy@vantagetowers.com)

### 3. Personal Data which we collect and process

When you complete the webform, we collect the following personal data for the purpose of communicating with you and fulfilling any Preliminary Contract obligations:

- First name
- Surname
- Role / Department
- Company Name
- Country Code and Phone Number
- Email address
- Email verification response (“Please verify your email”)
- Your free-text message (comments/description/features)
- Any other information necessary to reply to your request and take any steps necessary prior to entering into a contract with us or which you have provided to us voluntarily.

Additionally:

- The form records that you provided consent, which is required before submission.
- The system performs technical validation (email security check and field completion).

#### 4. Purpose and legal basis for processing your personal data

##### a. Responding to your inquiry and assessing your business request

This includes evaluating your interest in VantageTowers Limited solutions, routing your request to the relevant country team, and contacting you to discuss potential services.

**Our legal basis for the processing is Art. 6(1)(b) GDPR**, taking steps prior to entering into a contract

##### b. Creating Lead, Account, Contact, and Opportunity records in our Customers Relationship Management (CRM) platform

This is required for the internal management of your request and to ensure adequate customer-pre-contract handling.

**Our legal basis for the processing is Art. 6(1)(f) GDPR**, our legitimate interest for efficient and secure management of inbound B2B inquiries.

##### c. Using the information, you provide to contact you

To reach out to you using the contact details you provide in the form.

**Our legal basis for the processing is Art. 6(1)(b) GDPR.**

##### d. Processing your explicit consent for data submission

The form only submits if you actively consent. This consent relates to processing your personal data for evaluating your inquiry.

**Our legal basis for the processing is Art. 6(1)(a) GDPR**, your consent

##### e. Using your contact details to send you short Customer Satisfaction Surveys relating to your interaction with Vantage Towers, for the purpose of improving our commercial processes and customer experience.

**Our legal basis for this processing is our legitimate interest in evaluating and improving the quality of our services (Art. 6(1)(f) GDPR).**

#### 5. Storage period for personal Data

Your data will be retained :

- i. For as long as necessary to process and respond to your inquiry,
- ii. If your inquiry does not result in commercial engagement, your record will be retained in our CRM platform for the maximum period of 24 months from the date of your last interaction with Vantage Towers after which it will be securely deleted or anonymized.
- iii. If your inquiry progresses, your data will transition into an existing customer record, and the separate privacy notice for existing B2B customers will apply.

#### 6. Data subject rights

As a data subject, you have the following right in accordance with Art. 12 – 23 GDPR:

- request information as to your personal data we process and store (Art. 15 GDPR);
- request to rectify any inaccurate personal data or supplement any uncompleted personal data (Art. 16 GDPR); and
- subject to fulfilling the legal requirements, request erasure or restriction of processing or object to the processing of your personal Data as well as invoking the right to data portability (Art. 17, 18, 20 und 21 GDPR).
- If we process your personal Data based on your consent, you have the right to withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

You can withdraw your consent either via post, sending a letter under the title “**Consent withdrawal**” with the addition : “**To the Data Controller**” to the address: Vantage Towers Limited, Mountainview, Leopardstown, Dublin 18, Ireland or via email under the title “**Consent withdrawal**” with the addition “**To the Data Controller**” to the address: [info.ie@vantagetowers.com](mailto:info.ie@vantagetowers.com) stating your name and how and to which address you would like to receive the reply.

- **If we process your personal data for the purposes of our legitimate interests (Art. 6 par. 1 f) GDPR), you have the right to object to processing. If you claim your right to object, we will no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.**

If you claim any of your data subject rights, Vantage Towers Limited will analyze whether the legal preconditions are met.

Please address any request to our Group Data Protection Officer either via post to the address: Prinzenallee 11-13, 40549 Düsseldorf, Germany with the addition “**To the Data Protection Officer**” and with the indication: “**Exercise of GDPR Rights**” or via email to the e-mail address [privacy@vantagetowers.com](mailto:privacy@vantagetowers.com) with the addition: “**To the Data Protection Officer**” and the indication: “**Exercise of GDPR Rights**”, stating your name and how and to which address you would like to receive the reply.

We will respond to your requests free of charge within one (1) month of receiving the request. In exceptional cases this deadline may be extended for two (2) months if required due to the complexity of your request. In any case, we will inform you about this extension and the reason for the delay.

If we consider that your request is manifestly unfounded or excessive, we reserve the right to request a reasonable fee for its satisfaction, taking into account the administrative costs for its execution or even to refuse to follow up on your request.

In case you think that we have not sufficiently satisfied your request, and the protection of your personal data is affected in any way, you can submit a complaint to the Data Protection Commission

## 7. Recipients or categories of recipients

Your personal data may be shared with:

### a. Internal recipients

- Vantage Towers Commercial and Sales teams for the relevant country,
- Vantage Towers CRM and systems administration teams managing the CRM platform.

### b. External service providers (Data Processors)

- Website developers maintaining the form,
- CRM platform providers and associated tools,
- Email verification service providers.

All Data Processors operate under Art. 28 GDPR and are bound by strict confidentiality and security obligations.

Eventually we may transmit personal Data to countries outside the European Economic Area (third countries), which do not provide for the same data protection level. In such event, Vantage Towers Limited has taken measures to ensure appropriate safeguards are in place for the protection of your personal Data, such as for example the EU standard contractual clauses. If you wish any further information on any measures we have taken, please refer to our Group Data Protection Officer. If a transmission occurs within our group, it is done on the basis of a mutual contractual agreement, such as a data protection agreement.

## 8. What are the steps we take to protect your data

We apply the appropriate technical and organizational measures in our business processes, systems and platforms used to collect, process or use the data. The same obligations are ensured that are fulfilled by our service providers over the data processing agreements that we have entered into with them (Art.28 GDPR).

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