

Welcome to the Dalet Privacy Notice

This information has been produced to help you understand everything you need to know about the way Dalet collects, uses and shares personal data, what your legal rights are and how to exercise them.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

Dalet takes its responsibility of protecting your data very seriously and we do advise you get to know our practices – If there's anything here you don't understand or if you want to ask any questions, please feel free to contact us (detail are at the end).

Who is the Data Controller?

We are Dalet, a Company Registered in France

Registered address: 16 Rue Rivay, 92300 Levallois-Perret, Paris France

Registered number: 378 017 016

In this document Dalet may be referred to as "we", "us", or "our".

What kinds of personal data does Dalet process?

Dalet collects personal data for specific purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect are:

If you are a:	We may process these types of personal data:
Job applicant / Temporary or agency Staff / Volunteer / Intern	Name, address, telephone, email, work and education history,
Client	Name, address, telephone, email, usernames, job title
Subscriber / Prospect	Name, telephone, email,
Professional or principal contact	Name, address, telephone, email
Sub-Contractor	Name, address, telephone, email, bank details, tax information

What are the purposes Dalet collects personal data for?

Dalet uses personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for the organisations' financial commitments, or to relevant financial authorities
- To comply with regulatory requirements and any self-regulatory schemes
- To carry out required business operations and due diligence (E.g. administration, reorganisations, security, investment or corporate/asset sales)
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby the organisation may have to defend itself

We will also process personal data to achieve our various legitimate business interests; these are purposes that have been defined by us where we have balanced the necessity on our part to process the data for each purpose against your own expectations, interests and legal rights.

Our legitimate interests for processing personal data are:

- To provide goods and services where it has been requested
- To inform customers of other goods and services we provide or offers that may interest them
- To send notification on subjects to individuals who have asked to be kept informed (i.e. subscribers)
- To invite people to participate in research and surveys in fields and disciplines they are interested in
- To improve the quality of the services offered, and to better understand customers' needs by requesting feedback, or reviews of the services provided, or sending survey forms
- To send notifications of any changes to the goods and/or services provided that may affect people
- To understand the scale and range of the customer base; for statistical analysis and market research
- To allow the organisation to support and maintain its products in active service
- To provide reference information to third party organisations where requested, or where necessary
- To improve the organisations website so content is delivered more efficiently

Where does Dalet obtain personal data from?

We will collect personal data directly from you in various ways. This could include when you complete an online form, or if you provide the data directly to a representative of Dalet.

We also gather personal data by the following methods:

- From technical functionality that gathers data automatically from your computer equipment when you visit our online platforms.
- From platforms that make use of device settings that allow geographical location tracking, such as IP Address mapping, WiFi, GPS signals and cell tower positioning.
- From third-party organisations provided for a specific purpose; to deliver a product or service that has been requested.

Who will Dalet share your personal data with?

In order to achieve the above stated purposes for which we process your personal data, we may have to share your personal data with some specific third-party organisations.

We shall make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The third parties we may share your personal data with include:

- Third party organisation acting as either data processors or data controllers where it is necessary to provide goods or services that have been requested, or to achieve our business purposes.
- Third party data processors or data controllers necessary to setup various resources.

The specific types of third-party Dalet may share your personal data with include:

Contractors and Engineers

Dalet is not responsible for the data protection compliance of any of these third parties.

If we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

Where will Dalet store your personal data?

As a part of our standard business practices, we may transfer your personal data to countries outside the

European Union (EU), or to organisations who intend to transfer the data outside the EU.

Where data is transferred to international organisations, we shall ensure that specific safeguards or derogations have been established.

These might include where the data transfer is necessary in order to fulfil a contract between us and yourself, where we have received your specific consent after having made you aware of any risks involved, or where contracts are in place between us and the third-parties involved that ensure the recipient organisation has a suitable standard of data protection in place.

How long will Dalet keep your personal data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria apply that determine the period for which we will store your personal data:

- Until we are no longer required to do so in order to comply with any regulatory requirements or financial obligations that we are subject to.
- Until we are no longer required to do so by any law it is subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.
- Until it has been requested that we no longer process the data and that it is erased; in some cases, where there is a remaining relevant or legal reason why we are required to keep this data, we may opt to restrict the amount of processing being conducted to what is absolute necessary rather than erase it.

Where the lawful basis of our processing is based on protection of vital interests and insofar any relevant health and safety obligations apply, Dalet may retain your personal data for up to 40 years.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Dalet we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

The Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using our details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Erasure - Deletion

Otherwise known as the 'right to be forgotten', this given you the right to request your personal data be deleted.

This is not an absolute right; if you were to request that we erase your personal data, we would erase as much of that data as we could but may have to retain some information if it is necessary.

Were we have received a request for personal data to be erased, if it is necessary for us to retain some of that information we shall ensure that the remaining data is used only when and where it is absolutely necessary.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Dalet to a supervisory authority you may do so by contacting the Commission Nationale de l'Informatique et des Libertés at +33 1 53 73 22 22 or at <http://www.cnil.fr/en/contact-cnil>

Dalet contact details:

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privacy@dalet.com

Who is the Dalet Data Protection Officer?

Ametros Group Ltd
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