

# OUR COMMITMENT TO PRIVACY

## Privacy Notice

Last Updated: June 25, 2025

### Introduction

Your privacy is of the utmost importance to us, and we want to be transparent about the personal data we collect, why we collect it, how we collect it, and how we share it. This privacy notice (the “**Privacy Notice**”) describes how Dalet and its affiliates and subsidiaries (“**Dalet**” or “**we**”), collects, processes, and retains your personal data when you use <https://www.dalet.com> (the “**Website(s)**”) to purchase our products or services such as our workflow solutions that are linked to this Privacy Notice (collectively, the “**Services**”) however accessed and/or used, whether via personal computers, mobile devices, tablets or other means.

We also want you to understand your rights and choices regarding processing, access, correction, and deletion of personal data about you.

This Privacy Notice also applies to interactive features, subscription services, or downloads that are owned or operated by Dalet that are made available through the Services, or that interact with the Services and are linked to this Privacy Notice but does not include third party platforms, which are governed by their respective platforms’ applicable terms and privacy policies.

### Who we are and what do we do

Whether you’re a broadcaster, a studio, a sports organization or any other media-centric company, we can help. Dalet provides agile and intuitive workflow solutions.

Dalet consists of:

- Our Global headquarters: Dalet 140 rue Victor Hugo, 92300 Levallois-Perret France
- Our UK office: Dalet UK LTD: 6th Floor, Suite 114,30 Stamford Street, London SE1 9LQ United Kingdom
- Our Spain office: Dalet Spain: alle Vivero 5 28040 Madrid, Spain
- Our Germany office: Dalet Germany: Leopoldstraße 244 80807 München, Germany
- Our Italy : Dalet Italy: Via Triumplina 88 25123 Brescia (BS), Italy
- Our Israel office: Dalet Israel: Advanced Technologies Park Ha'Energiya St, 77, Be'er Sheva
- Our Middle East office: : P.O. Box 31810 Dubai, United Arab Emirates

- Our India office: Dalet India: Symbyont Smart spaces  
Campus 5, 9th Floor,  
No : 143 , MILLENIA BUSINESS PARK II  
MGR Road, Perungudi,  
Chennai 600 096, India
- Our APAC HQ: Dalet Singapore: 176 Orchard Road  
The Centrepont, #05-05  
Singapore 238843, Singapore
- Our Australia office: 161 Castlereagh St  
Sydney NSW 2000  
Australia
- Our Brazil office: Av. Mal. Câmara, 160  
Centro, Rio de Janeiro  
RJ, 20020-080, Brazil
- Our Mexico office: Retorno 59 No.42B  
Col Avante  
04460 México D.F., Mexico
- Our United States office: 88 Pine Street, 8<sup>th</sup> Floor  
New York, NY 10005

## How to contact us

Dalet has appointed a **data protection officer** who is responsible for our compliance with relevant data. Dalet is committed to securing your data and keeping it confidential and maintains compliance with data privacy regulations to protect against data theft and unauthorized access and disclosure of information. If you have questions related to our Privacy Notice, data protection practices or requests regarding your legal rights contact Dalet using the contacts at the end of this Privacy Notice.

## Data controller / Data processor

For most purposes, Dalet is a **data controller** of any personal data that it obtains and processes. In certain circumstances, we may act as a **data processor** on behalf of our Clients, in which case the privacy statements of the relevant Client will apply to any personal data that we process in the course of providing our Services (“Client Data”). With the exception of Client Data, **Dalet** is a data controller of Personal Data for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) and is registered as a **data controller** with the Information Commissioner’s Office (**ICO**) (the supervisory authority for data protection issues in the United Kingdom). Our registration number is Z1395417.

### Clients / Prospects

In this Privacy Notice, we refer to our clients (whether they are incorporated organizations, partnerships, sole traders or any other organization) as **Clients**, and we refer to third party businesses (whether they are incorporated organizations, partnerships, sole traders or any other organization) who are interested in learning more about our Clients or who our Clients are interested in targeting as **Prospects**.

## To whom does this Privacy Notice apply?

This Privacy Notice applies to:

- **Website Users:** all individuals who visit our website at [www.Dalet.com](http://www.Dalet.com) (or any other domain name registered in the name of any member of Dalet) (**Website**);
- **Individual Clients:** all individuals who are or have been our **individual Clients** (being sole traders or partners of a traditional or limited partnership or members of an unincorporated association);
- **Client contacts:** all individuals who are our **Client contacts** where the individual is an employee, director or other representative of an organization which is or has been our Client;
- **Individual Prospects:** all individuals who are or have been our **individual Prospects** (being sole traders or partners of a traditional or limited partnership or members of an unincorporated association);
- **Prospect contacts:** all individuals who are our **Prospect contacts** where the individual is an employee, director or other representative of an organization which is or has been a Prospect; or
- **Business contacts:** all individuals who are our business contacts where the individual or the individual's organization is a supplier or sub-contractor, supplies goods or services to us, provides professional services, has expressed an interest in us (including by contacting us by post, telephone, e-mail, social media or other means) or has any other business relationship with us (including where the individual's organization is a public authority, an industry body or regulatory authority or similar).

This Privacy Notice does not apply to existing, former or prospective employees or workers of Dalet. We have a separate privacy notice for existing, former or prospective employees or workers of Dalet.

## Information about our Website

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

Please see our [Cookie Notice](#) for further details.

## Protecting children's privacy

For the purposes of our data protection policies, we consider anyone under the age of 13 to be a child.

Our Website and Services are not intended for children and we do not knowingly collect any personal data relating to children. We do not intend for our products and services to be used, accessed or stored by children and we do not target children for marketing purposes.

If you are a parent or guardian and believe we may have collected information about a child, please contact our data protection officer at [dataprotection.officer@Dalet.com](mailto:dataprotection.officer@Dalet.com) or via any of the other methods set out in the How to contact us Section.

## 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:

<b>If you are a:</b>	<b>We may process these types of personal data:</b>
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
Website Users	IP Address mapping

Note that Dalet may collect name and image information, including information that may be used in connection with our image recognition services. Image recognition data may be considered biometric data in certain jurisdictions. We collect and process this information solely as Client Data, which mean we process it to fulfill our contractual obligations to our Clients. Our Clients are responsible for obtaining any consent and permissions required to use Client Data in connection with our Services.

## 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.

## Marketing

With regard to marketing-related communications (whether by e-mail, telephone, post, social media or otherwise) and direct marketing activities, we differentiate between individual consumers and individuals who are representatives of a business or organization.

If you are an **individual consumer** (e.g., an individual Client, individual Prospect or individual business contact):

- we will only provide you with direct marketing communications **by e-mail** where you have consented to receive such communications.
- we may from time to time contact you **by post** or **by telephone** with direct marketing communications where we feel that this may be relevant to you (based on services that we have previously provided to you) and you have not previously opted out of receiving such communications. When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.
- you can subscribe to such marketing communications, and you can adjust your marketing preferences at any time by contacting us on [privacy@Dalet.com](mailto:privacy@Dalet.com)
- you can also opt-out or unsubscribe from all or some of these marketing communications at any time by contacting us on [privacy@Dalet.com](mailto:privacy@Dalet.com) or by clicking “unsubscribe” at the bottom of any marketing e-mail.

If you **represent another business** (e.g., a Client contact, Prospect contact or corporate business contact):

- we may from time to time contact you and provide you with direct marketing communications in any format (**by e-mail, telephone, post, social media or**

**otherwise**) where we feel that this may be relevant to your business (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.

- you can subscribe to such marketing communications, and you can adjust your marketing preferences at any time by contacting us on [privacy@Dalet.com](mailto:privacy@Dalet.com)
- you can also **opt-out** or **unsubscribe** from all or some of these marketing communications at any time by contacting us on [privacy@Dalet.com](mailto:privacy@Dalet.com) or by clicking “unsubscribe” at the bottom of any marketing e-mail.

Where you opt out of receiving these marketing-related communications, this opt-out will not apply to personal data provided to us for any other purpose.

## 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 organisations 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.

## International transfers

Dalet is a global group of companies which provides products and services and engages third party service providers within as well as outside of the European Economic Area (**EEA**). As a consequence, whenever Dalet is processing personal data originating in the EEA in accordance with this privacy notice, Dalet may transfer such personal data to countries and territories outside of the EEA.

Whenever we are required to transfer your personal data originating within the EEA outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented, including any of the following:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further

details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers and for intra-group transfers within Dalet, we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- We may transfer your personal data to countries outside of the EEA with your explicit consent.

## Automated decision making or profiling

We do not use automated decision-making (including profiling) to make any decisions which would produce a legal or similarly significant effect on a data subject.

## How long do we retain your personal data?

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.

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the relevant data protection supervisory authority of a breach where we are legally required to do so.



# Your rights

With regard to any personal data that is processed by Dalet, you may:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, following your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data’s accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us at [privacy@dalet.com](mailto:privacy@dalet.com)

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Additional Information: California Residents

Dalet is required to provide Notice at Collection for California residents whose personal data is collected, used, and disclosed subject to the CCPA.

The table below is a summary of the categories of personal data we have collected over at least the last 12 months, the purposes for collection and use of that personal data, and who we share each category of personal data with.

What Data Do We Collect?	Why Do We Process Your Data?	Who Do We Share Your Data With?
<b>Personal identifiers</b> such as name, email, usernames, and telephone.	<ul style="list-style-type: none"><li>• To provide goods and services where it has been requested</li><li>• To inform customers of other goods and services we provide or offers that may interest them</li><li>• To send notification on subjects to individuals who have asked to be kept informed (i.e. subscribers)</li><li>• To invite people to participate in research and surveys in fields and disciplines they are interested in</li><li>• 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</li><li>• To send notifications of any changes to the goods and/or services provided that may affect people</li><li>• To understand the scale and range of the customer base; for statistical analysis and market research</li><li>• To allow the organisation to support and maintain its products in active service</li><li>• To provide reference information to third party organisations where requested, or where necessary</li><li>• To improve the organisations website so content is delivered more efficiently</li></ul>	<ul style="list-style-type: none"><li>• Payment providers</li><li>• Shipping providers</li><li>• Website vendors</li><li>• Email service providers</li></ul>

<b>Content Data</b> , such as forms, surveys, social media posts and text message communications.	<ul style="list-style-type: none"> <li>• To inform customers of other goods and services we provide or offers that may interest them</li> <li>• To send notification on subjects to individuals who have asked to be kept informed (i.e. subscribers)</li> <li>• To invite people to participate in research and surveys in fields and disciplines they are interested in</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Website vendors</li> <li>• Social Media companies</li> </ul>
<b>Commercial data</b> such as bank details, including routing and checking information, and tax information.	<ul style="list-style-type: none"> <li>• To provide goods and services where it has been requested</li> <li>• To perform our contract with you and provide the Services requested</li> <li>• To comply with our legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Payment processor</li> <li>• Our Business Partners</li> <li>• Auditing and accounting firms</li> </ul>
<b>Internet activity data</b> such as IP Address mapping	<ul style="list-style-type: none"> <li>• To improve the organisations website so content is delivered more efficiently</li> <li>• To understand the scale and range of the customer base; for statistical analysis and market research</li> <li>• To allow the organisation to support and maintain its products in active service</li> </ul>	<ul style="list-style-type: none"> <li>• Analytics services</li> <li>• Security vendors</li> <li>• IT vendors</li> </ul>
<b>Professional data</b> such as job title, company, work history, and education.	<ul style="list-style-type: none"> <li>• To provide goods and services where it has been requested</li> <li>• To inform customers of other goods and services we provide or offers that may interest them</li> <li>• To invite people to participate in research and surveys in fields and disciplines they are interested in</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Payment processor</li> <li>• Our Business Partners</li> <li>• Auditing and accounting firms</li> </ul>
<b>Audio, electronic, visual, or similar Information</b> , such as audio recordings.	<ul style="list-style-type: none"> <li>• To provide goods and services where it has been requested</li> <li>• To provide quality assurance tests on our customer service agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Security vendors</li> <li>• IT vendors</li> <li>• Communication providers</li> </ul>
<b>Metadata and Image recognition data</b> , such as	<ul style="list-style-type: none"> <li>• To provide services including AI-based image recognition services to</li> </ul>	<ul style="list-style-type: none"> <li>• Clients</li> <li>• IT vendors</li> </ul>

data that can be used to recognize similar images across multiple pieces of content.	match images across media assets where it has been requested by our Client(s)	
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We will retain your personal data, as described above, as long as required to comply with our contractual obligations to you and our legal obligations. We do not sell or share your personal information. To the extent that any of the information we collect may be considered sensitive, we only use or disclose such information to perform our Services, required under our contractual obligation to our Clients.

In addition to the rights above, you also have the following rights in California:

- *Right to Opt Out* – The CCPA provides the rights to opt-out of both the sale and sharing of personal information for cross-context behavioral advertising; opt-out of automated decision-making/profiling technology in connection with decisions with significant or legal effects; and opt-out of the processing of sensitive personal information. We do not sell or share your personal information; do not use automated decision making or profiling technology to make any decisions with significant or legal effects; and only process sensitive personal information to provide the Services request by our Clients.
- *California’s “Shine the Light” Law* – permits users of our Site that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. \*Note that we do not share personal data with third parties for their direct marketing purposes.
- *Authorized Agent* – The CCPA may permit consumers to designate authorized agents to submit requests on their behalf. Under the CCPA, an authorized agent is a natural person or a business entity in California that a person has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know, a request to delete, or a request to correct personal information on your behalf, please email at [privacy@Dalet.com](mailto:privacy@Dalet.com). When submitting the request, please ensure the authorized agent identifies himself/herself/themselves as an authorized agent.

You or your authorized agent may provide us with a written power of attorney, executed by you, confirming the authority of the authorized agent with respect to your Consumer request(s).

If we have not received a power of attorney, we may require your authorized agent to provide proof that you gave the agent signed permission to submit your Consumer request(s).

In addition, we may also require you to do the following directly with us:

- Verify your own identity with us;
- Confirm you have provided the authorized agent permission to submit the Consumer request(s).
- Once verified, your authorized agent may act on your behalf.

- *Appeals.* You may have a right to appeal decisions concerning your ability to exercise your consumer rights. Please contact us at [privacy@Dalet.com](mailto:privacy@Dalet.com) to request an appeal concerning decisions on your consumer request.
- *No Discrimination.* Dalet will not discriminate against you because you made any of these requests. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

## Complaints

You have the right to make a complaint at any time to an appropriate data protection supervisory authority, as set out below. We would, however, appreciate the chance to deal with your concerns so please contact us in the first instance on [privacy@Dalet.com](mailto:privacy@Dalet.com)

- **EU / GDPR:** Under the GDPR, you have the right to complain about how we are processing your personal data to a relevant data protection supervisory authority within the European Union. Our lead supervisory authority for the purposes of the GDPR is the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (who can be contacted via [www.ico.org.uk](http://www.ico.org.uk)), but if you are a resident of the European Union you may also lodge a complaint with the data protection supervisory authority of the EU member state in which you live. Click here to view a list of all Supervisory authorities in the EU.

## Changes to this privacy notice

We may update this privacy notice to reflect changes, to our information practices. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Who is the Dalet Data Protection Officer?

Ametros Group Ltd  
 Lakeside Offices, Thorn Business Park  
 Rotherwas Industrial Estate  
 Hereford  
 Herefordshire England HR2 6JT  
 T: 0330 223 2246  
 @: [dpo@ametrosgroup.com](mailto:dpo@ametrosgroup.com)  
 W: [www.ametrosgroup.com](http://www.ametrosgroup.com)