

N02 PRIVACY NOTICE

Introduction

This privacy notice explains how we collect your personal data, the types of personal data we may collect about you, why we need it, what we do with it, how long we keep it, what we do with it and what your rights are.

This notice relates to both personal data that we have collected ourselves or acquired for our use, as well as data which has been provided to us by our clients and which we use to provide a service.

- When Dakar Enterprises Limited determines the purpose and means of processing of personal data collected, they are considered the Data Controllers.
- When Personal data is collected and processed by Dakar Enterprises Limited on behalf of their clients who determine the purpose and means of processing Dakar Enterprises Limited acts as a data processor.

This notice has been updated for the General Data Protection Regulation (GDPR). We are committed to protecting your privacy and the security of your personal data. We will not give or sell your information to any other company. We will only use such information to provide you with our services and keep you updated.

How do we collect your personal data?

We may collect your personal data when you:

1. Visit our website;
2. Contact us by phone or email;
3. Engage with us on social media
4. Sign any of our service/product contracts
5. Fill out any form of information (eg. Contact Us Form)

What type of personal data do we need?

Our Personal Data Protection Policy governs the use and storage of your data. You can a copy of our Personal Data Protection Policy by contacting our Data Protection Officer, in writing, at gdprdpo@dakarsoftware.com.

Dakar Enterprises Limited is a data processor of the personal data our clients (our client and data controller) provide us with and of which our clients determine the purpose and means of processing.

We collect the following types of personal data from you to offer you a service therefore acting as data processors on your behalf:

- Username and Password when accessing our Salaroo portal
- Your name
- Your surname
- Your designation
- Your company name
- Your telephone number

- Your email address
- Country of residence
- Your project data templates
- Information related to the browser or device you use to access our website

When acting as a data processor on behalf of our clients, we may collect **Special Categories of Personal Data** about you (this includes details about ethnicity or religious beliefs).

We use reasonable efforts to safeguard the confidentiality of any and/or all Personal Data that we may process relating to our clients and regularly review and enhance our technical, physical and managerial procedures so as to ensure that your Personal Data is protected from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

To this end We have implemented security policies, rules and technical and organisational measures to protect the Personal Data that We process on behalf of our clients. All our members, staff and sub data processors (including specific subcontractors), who may have access to and are associated with the processing of Personal Data, are further obliged (under contract) to respect the confidentiality of data subject's Personal Data as well as other obligations as imposed by the Data Protection Laws.

Why we need your personal data

We need your personal data:

- to establish and fulfil a contract with you, for example, if you enter into an agreement to provide or receive services. We require this information to enter into a contract with you and are unable to do so without it;
- to maintain an effective communication channel with you throughout the execution of a service/job, to manage our relationship with you as our customer and to improve our services and enhance your experience with us in the future;
- to respond, with your express consent, to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
- to personalise (i) our communications to you; provide you with (ii) updates on any services/products we are providing you with (iii) updates on any jobs where your services may be required; and (iv) products or services for you, in accordance with our legitimate interests;
- to protect Dakar Enterprises Limited's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- to receive payment for any products/services provided

Where applicable and allowed, you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic communications at any time by following the instructions in the relevant communication.

What we do with it

Your personal data is processed in our offices in St. Julians located in the Malta. Hosting and storage of your data takes place on our dedicated servers located within the Dakar Enterprises Limited premises in St. Julians.

We may also share your personal data with the below third parties;

- Any regulatory authority or statutory body pursuant to a request for information or any legal obligation which applies to us;
- Third-party suppliers who support our day-to-day activities which may include; Office365, WeTransfer, Sage, Dropbox, Active Directory, TeamViewer, ConnectWise and Microsoft Remote Desktop Application
- Our professional advisors such as our auditors, consultants and external legal and financial advisors

No other third-party providers have access to your data, unless specifically required by law.

How long we keep it?

As data processors on behalf of our clients:

Under Maltese law, we are required to keep your documents according to your (our client) Data Retention Policy. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing, service update notifications and requests for services or products required by Dakar Enterprises Limited, will be kept by us until such time that you notify us that you no longer wish to receive this information. We will not retain your data for longer than you (our client) stipulate.

We will keep your information for the length of any contractual relationship you have with us and after that for a period of 10 years due to fiscal laws that impinge on Dakar Enterprises Limited. In cases of legal issues, these are retained until the relevant court case is resolved.

As data controllers:

Under Maltese law, we are required to keep your documents according to our Data Retention Policy. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing, service update notifications and requests for services or products required by Dakar Enterprises Limited, will be kept by us until such time that you notify us that you no longer wish to receive this information.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

What are cookies and how do we use them?

Cookies are small text files which are stored on your computer when you visit certain web pages. At Dakar Enterprises Limited, we use cookies to understand how our sites are used which helps us to improve your overall online experience. Some of the cookies we use are necessary for some of our sites to work whilst other cookies are used to provide tailored advertising by trusted third parties.

There are generally two categories of cookies used on our Sites:

- **Functional:** These cookies are required for basic site functionality and are therefore always enabled. These include cookies that allow you to be remembered as you explore our Sites within a single session or, if you request, from session to session.
- **Third party:** Third party cookies offer the possibility to connect you to your social networks and share content from our Sites through social media. Advertising cookies (of third parties) collect information to help better tailor advertising to your interests, both within and beyond our site. In some cases, these cookies involve the processing of your personal data. Refusing these cookies may result in seeing advertising that is not as relevant to you or you not being able to link effectively with Facebook, Twitter, or other social networks and/or not allowing you to share content on social media.

You can always change your preference by visiting the "Cookie Settings" at the bottom of each page of our Sites. If you'd prefer to restrict, block or delete cookies from Dakar Enterprises Limited and our third-party advertisers, or any other website, you can always change your preference by visiting 'Cookie Settings' at the bottom of the page or use your browser to do this.

For a comprehensive and up-to-date summary of every third-party accessing your web browser, we recommend installing a web browser plugin built for this purpose. You can also choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings on each browser and device that you use. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to many features that make our Sites and Apps more efficient and some of our services will not function properly.

What are your rights?

You have the right to request:

- access to your personal data;
- an electronic copy of your personal data (portability);
- correction of your personal data if it is incomplete or inaccurate; or
- deletion or restriction of your personal data in certain circumstances provided by applicable law.

Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

To exercise your rights, please follow the instructions listed in the 'Know Your Rights' page

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Information & Data Protection Office (IDPC) located in Sliema and file a complaint with them.

Office of the Information and Data Protection Commissioner

Floor 2, Airways House, Triq Il-Kbira, Tas-Sliema SLM 1549, Malta

idpc.info@idpc.org.mt