

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, for example a 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: compliance@dakarsoftware.com.

Dakar Enterprises Limited is a data processor of the personal data our clients 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 following 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 do 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 your rights?

Right to be informed

As a data controller we must tell you what data is being collected, how it's being used, how long it will be kept and whether it will be shared with any third parties.

Right of access

You have a right to request a copy of the information that we, as data controllers hold on you.

Right of rectification

You have a right to correct inaccurate or incomplete data.

Right to be forgotten

In certain circumstances, you can ask to erase any personal data.

Right of portability

In some circumstances, you can request that we transfer your personal data to another company or provide you with an electronic copy of it.

Right to restrict processing

In some circumstances, you can request that we limit the use of your personal data.

Right to object

You have the right to challenge certain types of processing, such as direct marketing.

Rights related to automated decision making, including profiling

In most circumstances, you have the right to object to activities where automatic decisions are made based on your personal data.

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) 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