

**/ PRIVACY POLICY****WWW.ICOVER-SERVICES.COM**Last modified on: **February 22<sup>ND</sup>, 2018**Effective Date: **February 22<sup>ND</sup>, 2018****CONTENT****Introduction and Scope****Personal Data Processing****Information Collection****Cookies****Personal Data Usage****Disclosure of Personal Information to Third Parties****Access of Information****International Transfer****Informational Security****Data Retention Period****Links to Other Websites****Children's Privacy****Changes to our Privacy Policy****Contact Details**

## **INTRODUCTION AND SCOPE**

Advise Data S.A.R.L., operating under its trade name iCOVER (iCOVER, “we” or “us”) is a company specialized in wholesale background screening solutions for the global market with headquarters located at 16/18 rue Gaillon, 75002 Paris, France, registration number SIRET 530 913 813 00032, with major offices in the United Kingdom, Switzerland, Bulgaria, Mexico and India. As part of the business activity, iCOVER collects and processes information about people and companies that could constitute personal data.

This Privacy Policy is used to inform website visitors about iCOVER’s internal rules for collection, use, and disclosure of personal data. It applies to <https://www.icover-services.com> and aims to describe and explain our information practices and the measures we take to protect your privacy and to comply with applicable laws and obligations. Some of the services provided could have particular privacy practices that could differ from the present Policy.

## **PERSONAL DATA PROCESSING**

Personal data (as per the definition of Regulation 2016/679) is any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We collect, use, disclose, transfer, and store personal information when needed to provide our services and for our operational and business purposes as described in this Policy.

## **INFORMATION COLLECTION**

iCOVER collects personally identifiable information when you submit such information through its website. For instance, iCOVER collects your name, e-mail address and other personally-identifiable information you provide as "comments" when you submit an inquiry through the "Contact Us" section in the website.

iCOVER also collects the information you provide in case you subscribe for Newsletter in the relevant section in order to receive updates from iCOVER. This data could also correspond to the definition of personal data and therefore could be subject of the present Privacy Policy.

In case you would like to follow the section “Career” and apply for open positions in iCOVER you will be forwarded to send your application via email with all relevant data including personal one concerning your job application.

Website usage information is collected using cookies. For more information please see section “Cookies” hereunder.

## **COOKIES**

iCOVER may use cookies on its websites to improve performance and enhance your user experience.

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences), so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

### Description of cookie: Google Analytics

Purpose of cookie: These are analytics cookies. These cookies are used to collect information about how visitors use our site, for search engine optimization and marketing purposes. Those cookies are not essential for the work of the website. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Google stores the information collected by the cookies on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Unless you opt-out of the Google Cookie, you consent to the use of the Google Cookie and any information generated by Google Analytics. You can find out more about this service at <http://www.google.com/analytics>.

### Description of a cookie: cookie notice accepted

Purpose of the cookie: These cookies are used only for the purposes of asking website visitor's consent for usage of cookies and complying with law requirements. It is a one month, first party cookie, the website in scope if the one accessing and controlling the information.

You can control and/or delete cookies as you wish – for details, see [aboutcookies.org](http://aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

## **PERSONAL DATA USAGE**

We process personal information for service and business-related purposes.

Information submitted via “Contact us” section is used for the purposes of making a contact with you and respond to your information request or otherwise allow you to interact with us. iCOVER uses any such personal information to perform services for its clients and to administer and manage its relationships with its clients and potential clients. Such information is processed based on your request, by fulfilling the contact form (whereas grounds for processing is the eventual necessity for performance of a contract with iCOVER or taking steps at your request prior to entering into a contract and your consent given by fulfilling the contact form).

Information submitted via “Newsletter” section will be used to fulfil information requests and send periodically information and updates regarding iCOVER’s services, products and processes. Information for newsletters subscriptions could be also used for trends analytics, tracking subscribed user movements and gather statistical information. This information is processed based on your subscription/consent and following the legitimate interest of iCOVER for informing its clients for last news concerning iCOVER, its services, processes and products.

iCOVER would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date at any time. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please follow the unsubscribe option in the received email communication. Instructions on how to opt out of receiving these emails are included in each email with marketing content.

Personal information submitted via the “Careers” section and forwarded by email will be used to facilitate its receipt and processing of your career - related inquiries. All the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. Grounds for processing is the eventual necessity for performance of a contract with iCOVER or taking steps at your request prior to entering into a contract. We will use the contact details you provide to us to contact you and to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

## **DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

iCOVER will not transfer and disclose your personal information to third parties’ other than the described in this Privacy Policy unless iCOVER has received your permission for such transfer or is required/ permitted by law. iCOVER may share such information with its affiliates if necessary to carry out the purposes for which the information was supplied or collected. All our employees are required to follow our data privacy and security policies when handling personal information. Similarly, third party contractors, consultants and/or vendors engaged by iCOVER to provide

services related to its website may have access to such personal information (these third parties must first agree to maintain strict confidentiality and restrictions on use and disclosure of such information and provide the same level of data security as provided by iCOVER). Third party contractors could be engaged for the following reasons: to provide a service on our behalf, to perform service-related services (i.e. mailing services provision), to facilitate our services.

## **ACCESS OF INFORMATION**

You have the right to access and to request a copy of the information that we hold about you.

You may ask us to correct or remove information you think is inaccurate and/or needs to be updated.

You have the right to object to processing of your personal data, to opt for erasure of the data collected and/or to restrict processing when applicable under legislation.

If you are not satisfied with how iCOVER manages your personal data, you have the right to make a complaint to a data protection regulator.

If you would like to contact us in view of exercising your rights, please email or write to us by using our contact details in Contact Details section below.

## **INTERNATIONAL TRANSFER**

Consistent with the other sections of this Privacy Policy, iCOVER may transfer certain personal information across geographical borders to iCOVER's offices, personnel, or third parties located throughout the world. iCOVER may also store such information in a jurisdiction other than where you are based.

When iCOVER transfers personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as in your home country, iCOVER takes measures to provide an appropriate level of data privacy protection. Your protections remain with your data. For example, such measures are the usage of approved contractual clauses, multiparty data sharing agreements, intragroup agreements, frameworks for data transfers and other measures designed to ensure that the recipients of your personal information protect it.

## **INFORMATIONAL SECURITY**

iCOVER has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction.

Despite iCOVER's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of iCOVER's ability, access to your personal information is limited following the need to know principle.

## **DATA RETENTION PERIOD**

iCOVER only keeps the data for the time necessary to fulfil the purpose of its collection or further processing in accordance with iCOVER's Purging Policy requirements. We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, iCOVER takes into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need the information, we securely delete or destroy it.

## **LINKS TO OTHER WEBSITES**

This Privacy Policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **CHILDREN'S PRIVACY**

Our Services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **CHANGES TO OUR PRIVACY POLICY**

The present Privacy Policy may be subject to update that will be published on our website. Thus, we advise you to review this page periodically for any changes. Such changes are effective immediately, after they are posted on this page.

**CONTACT DETAILS**

If you want to request information about our Privacy Policy you can email us or write to: [contact@icover-services.com](mailto:contact@icover-services.com)

Or contact our Data Protection Officer at [dpo@icover-services.com](mailto:dpo@icover-services.com)