

## PRIVACY POLICY

This privacy policy provides you with information regarding the processing of your personal information when you make contact with us or use one of our services. This privacy policy is provided in accordance with the General Data Protection Regulation 2016/679 (“GDPR”) and any EU national laws implementing or supplementing the same (the “Data Privacy Laws”).

### ABOUT US AND OUR PRIVACY COMMITMENT

The iCOVER Group is specialized in international verification services with operation on a global scale.

In the course of the performance of our services, we may process personal information for service and business-related purposes including background screening, compliance verifications and due diligence services on behalf of our clients.

The privacy policy (the “Policy”) sets out important information about your rights in relation to the processing of your personal information in the course of using our services. The Policy also outlines the basis on which any personal information, we collect from you or that you provide to us, will be processed in connection with your use of our services.

We are firmly committed to respect your right to privacy and take seriously our responsibilities in relation to the processing of personal information. We do not collect or process personal information unnecessarily and we do not solicit or receive information from children.

### WHAT INFORMATION DO WE COLLECT?

The Policy primarily related to personal information collected and processed in order to operating our business. We collect information as name and contact details in order to communicate and facilitate the provision of our services with our clients, potential clients or suppliers. Initial information about you can be provided by the company you are working for. You may provide us information by using our services or by corresponding with us by phone, e-mail or otherwise. Other occasions during which you provide us information is when searching for a product, place an order, report a problem or engage with any other form of communication with us. We may collect information to respond to inquiries regarding our products and services or to provide you with information, reports, or updates.

When you visit our website or use our platforms, we may collect information about your visit such as your IP address, login information, browser type, time zone setting and the pages you visited and when you use our services we may collect information on how you use those services. Our websites and online platforms may use cookies from time to time. Cookies may be used to save your personal preferences so you do not have to re-enter them each time you access our services. For more about our use of cookies and how you can disable them, please see our cookie policy.

In the course of providing our services to our clients, they engage us on a wide range of matters to help them mitigate risk such as conducting due diligence on a potential partner, supplier or acquisition target. The personal information we process in the performance of services for and on behalf of our clients includes but is not limited to any information relating to an identified or identifiable individual, for example, the individual’s name, contact information, education information, work history, directorships, financial information, as well as, where necessary, data concerning criminal convictions

and offences. We treat all such information within the strict confines of the GDPR. The lawful bases for such data processing are defined by our client and will vary depending on the nature of the information and the project, but will include (i) consent, (ii) necessary for the purpose of our or our client's legitimate interests; (iii) necessary for the prevention or detection of an unlawful act; and (iv) the information has been made public by the individual.

#### WHAT WE DO WITH YOUR INFORMATION?

We will only process personal information when the law allows us to. Where we process your personal information to register you as a customer/user, accept your orders, deliver services to you, collect our fees, we do so on the basis that it is necessary to perform our obligations under contract with you or a company you work for. It may also be necessary to comply with certain legal obligations.

Where we process your personal information to send you newsletters, respond to your questions, improve the contents of our website and marketing efforts, conduct research and analysis and display content based on your interests, we do so on the basis that it is necessary for our legitimate business interests. These interests include the interests of ensuring our clients receive premium service, growing our business to best satisfy changing market needs, and ensuring continual improvements to our suite of product and services.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with this Policy, where this is required or permitted by law.

#### HOW LONG WE KEEP YOUR INFORMATION?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The period of time for which we store your personal information may depend on the type of information we hold. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, we may hold personal data as needed for our accounting or tax compliance purposes or where needed for our compliance with anti-money laundering regulations in accordance with the respective statutory periods.

#### DISCLOSURE OF YOUR INFORMATION

We only share your personal information with your consent or in accordance with this notice. We will not otherwise share, sell or distribute any of the information you provide to us except as described in this notice. We may disclose information to any department or authorized person within our company or any affiliated company within our group and selected third-parties only in the circumstances where it is necessary and the supplier has agreed to the same standards and terms of privacy as set out in the Policy.

We will disclose your personal information to third-party recipients in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of our business or assets or if we are under a duty to disclose or share your personal information

in order to comply with any law, legal obligation or court order, or in order to enforce rights under the GDPR or to apply our Terms of Use and other agreements.

## INTERNATIONAL TRANSFERS

Personal information may be transferred to our trusted partners and service providers who maintain their servers outside of the European Economic Area (“EEA”). This is only for the purposes of providing, and to the extent necessary to provide, our services. We comply with the special requirements provided by the GDPR in order to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal information on transfer.

## SECURITY MEASURES

We use accepted standards of physical and technical measures and require our hosting partners to use the same standard of care in order to protect personal information. Unfortunately, the transmission of information via the internet is not completely secure.

Despite our best effort to protect personal information, the transmission of information via the internet is not completely secure. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## YOUR RIGHTS

The GDPR establishes certain rights of individuals in relation to their personal data. These rights include the right to request access to the personal data that we hold about you; the right to have us correct and update your personal data where it is inaccurate or incomplete; the right to have us delete your personal data; the right to object to our processing of your personal data; the right to ask us to restrict the processing of your personal data; the right to ask that we transfer your personal data; and the right to withdraw consent to our processing of your personal data.

## THIRD PARTY MATERIAL

We always endeavour to deal with vendors and other third parties who are GDPR compliant or, in the case of the third parties located outside of the EEA, who are certified as compliant with the EU-US Privacy Shield, as applicable, or who have adequate security measures in place to safeguard the security of personal information. That said, we, our employees, agents, holding company and subsidiaries, accepts no liability howsoever arising for the content or reliability of any third-party materials or websites referenced by hyperlink or other means on our websites/platforms or for the data collection and use practices or security measures used by such third parties. If you submit personal data to any of those sites, your personal information is governed by their privacy policy. We encourage you to carefully read their privacy policies.

## CHANGES TO THIS POLICY

Any changes made to this Policy from time to time will be published at the Platform. Any material or other change to the data processing operations described in this Policy which is relevant to or impacts on you or your personal data will be notified to you. In this way, you will have an opportunity to consider the nature and impact of the change and exercise your rights under the GDPR in relation to that change (e.g., to withdraw consent or to object to the processing) as you see fit.

## QUESTIONS OR COMPLAINTS

Should you have any queries or complaints relating to this Privacy Policy, please contact us at: [dpo@i-cover-services.com](mailto:dpo@i-cover-services.com)

You have the right to lodge a complaint with the French Data Protection Authority (*Commission Nationale de l'Informatique et des Libertés*).

*Effective Date of this Policy: 25th of May 2018, Last updated on 25 January 2019*