



dIREKTION 360 (dIREKTION) is committed to preserving the confidentiality and security of personal information (the "personal information") and to respecting the data protection legislation applicable under the law in force. Below is our **Personal Information Protection Policy**: it provides information on the types of personal information that dIREKTION may collect and how it is used and protected.

About dIREKTION 360

dIREKTION, being a professional services company, acts as the controller of the personal information provided by its clients, its business partners, and other persons, in particular the users of its website. Please refer to the **Contact section** of our website for any questions regarding who is responsible for processing your personal information.

Collection and use of your personal information

dIREKTION collects and processes different types of personal information about you based on your status as a potential or current customer or business partner, user of the dIREKTION website or candidate for employment within dIREKTION. If you provide personal information about others to dIREKTION (for example, other people within your company), please let them know about our **Personal Information Protection Policy**.

Here is an overview of the personal information that dIREKTION may collect from you as a user of the website or as a person interacting with dIREKTION on social media or by email:

- Name.
- Company.
- Title.
- Email address.
- Phone number.
- IP address.
- Information obtained using cookies and software devices by dIREKTION.

dIREKTION may collect this information from various sources or in various contexts, including:

- Inquiries or other correspondence sent to dIREKTION by email, on social media or via blogs affiliated with dIREKTION.
- Subscription to the dIREKTION newsletter, a blog or other marketing communications.
- dIREKTION website (cookies may be placed on your computer or mobile device).

dIREKTION uses this personal information for legitimate business purposes, such as marketing of its services, prospecting activities or other purposes permitted by applicable law. For example:

- Respond to your requests for information.
- Communicate with you regarding matters related to your requests.
- Provide you with additional information about dIREKTION services that may be of interest to you.

dIREKTION will not sell or rent your personal information to third parties and will only exchange it with:

- Other dIREKTION entities.
- Providers who process data on behalf of dIREKTION.
- Third parties in the context of a merger, acquisition, or sale of dIREKTION assets.
- Third parties when required by law.

Regarding potential or current customers or business partners, dIREKTION may collect information such as:

- Name.
- Title.



- Company.
- Email address.
- Banking information (for payments).
- Information obtained from public sources, such as online searches.

This information may be collected in various contexts, including:

- Inquiries sent to dIREKTION via email, social media, or affiliated blogs.
- Professional activities or conferences.
- In-person meetings.
- Provision of services or signing of contracts with dIREKTION.
- Prospecting for business partnerships.
- dIREKTION offices or access to its systems.

dIREKTION uses this information for legitimate business purposes, such as entering into contracts, managing business relationships, providing professional services, and complying with legal obligations.

For current or potential candidates for employment at dIREKTION, dIREKTION collects and processes information such as:

- Name.
- Address.
- Contact details.
- Personal information such as date of birth, driving license number, banking information and legal status.
- Training.
- Professional experience.
- Recommendations or results of verifications carried out as part of the hiring process.
- Resumes.
- Information from your cover letter or job application.

All information provided in a job application must be accurate, as incorrect information may result in withdrawal of a job offer or termination of employment. dIREKTION collects this information directly from you, from dIREKTION careers web pages, from referrals provided by you or third parties, and from verifications made as part of the hiring process. dIREKTION uses this information for legitimate business purposes, such as evaluating job applications, managing recruitment processes, providing information about job vacancies, and verifying information with third parties. dIREKTION does not sell or rent your personal information to third parties and only shares it with:

- Other entities of dIREKTION.
- Third parties in the context of a merger, acquisition, or sale of assets of dIREKTION.
- Third parties who assist dIREKTION in the hiring process.
- Third parties required by law (banks, insurance companies, etc.).

International data transfer and processing of personal information (considerations surrounding the international transfer and processing of personal information)

dIREKTION now operates globally and has a subsidiary in the United States. When you provide your personal information to dIREKTION, it may be transferred, processed, or stored on servers located in Canada, where dIREKTION is headquartered, or in other countries where dIREKTION operates. As a result, your data may be accessible to government authorities pursuant to court orders or foreign laws. It is important to note that in such situations, your personal information may not benefit from the same protections afforded by the laws of your country of residence.



dIREKTION implements appropriate security measures for international transfers of personal data and takes all necessary measures to ensure that your personal information is protected and processed in accordance with its Privacy Policy as well as applicable laws in matters of privacy protection. By providing your personal information to dIREKTION, you consent to its transfer and processing by dIREKTION in various territories.

Protection of your personal information (measures deployed to protect your personal information)

dIREKTION implements reasonable customary security measures and uses technologies that aim to ensure the security of your personal information and the protection of it against loss, misuse, unauthorized access, disclosure, modification, and destruction. Where third party vendor companies process personal information on behalf of dIREKTION (e.g., payroll service providers or outsourcing companies), specific security measures are put in place as necessary through contractual agreements with these companies.

dIREKTION may use your email address to communicate with you regarding a security incident involving your personal information.

Email monitoring or blocking software may be used for security purposes and compliance with dIREKTION policies.

Social media (factors to consider when using discussion forums and/or other social media software platforms on different websites)

Any information you share or reveal on dIREKTION social media or discussion forums, such as Facebook, YouTube, Twitter, or other similar applications, is considered public. dIREKTION does not have the ability to monitor or control the use of information disclosed on these social media platforms or discussion forums. It is therefore imperative to exercise great caution when sharing information in publicly accessible spaces, and to think carefully about how you do so.

It should be noted that the content published on the dIREKTION forums, including the advice and opinions expressed, exclusively reflects the views of those who publish them, and these persons are entirely responsible for them. dIREKTION does not necessarily endorse, support, or verify content posted on its social media or forums, and does not automatically commit to such content.

dIREKTION website integrates software elements from social networks, such as the Facebook, YouTube, LinkedIn, Instagram, Google+ and Twitter sharing buttons. These software elements may be hosted by third parties or directly on the dIREKTION website. Your interactions with these elements and widgets are subject to the privacy policy of the company providing them. In addition, it is possible that these elements record your IP address and the page of the dIREKTION site that you are viewing, and that they create a cookie to ensure their proper functioning.

CLOUD INFORMATION (use of cloud services and impacts for you)

dIREKTION may save your personal information on a cloud. This means that your personal information may be processed by a cloud service provider on behalf of dIREKTION and stored in various locations around the world. dIREKTION deploys organizational and contractual measures to protect your personal information and impose appropriate security and data protection obligations on its cloud service providers, including the obligation to process your information only for the purposes set out in this ***Policy on the protection of personal information***.

TELEPHONY (type of technology used for telephone communications and the impacts on you)

dIREKTION uses VoIP technology when you communicate with dIREKTION by telephone. You can learn more about VoIP technology by visiting Wikipedia. As your call is relayed via the Internet, dIREKTION cannot control where your data is processed. dIREKTION VoIP services are managed by 3CX.



Data preservation/retention (data retention practices)

dIREKTION does not retain your personal information beyond what is necessary. It is retained and used for as long as necessary to satisfy legal obligations, resolve disputes and enforce agreements in place. For example, regarding customer information, dIREKTION generally retains it for the duration of the provision of services and for three (3) years after the end of the commercial relationship, unless the law imposes a period of different retention or there is a current or potential dispute.

Your rights as a data subject

Under applicable law, you have the following rights, subject to certain conditions and exceptions:

- The right to object to the processing of your personal data for direct marketing purposes. To exercise this right, you can contact the Personal Information Protection Office of dIREKTION at any time.
- The right to obtain a copy of your personal data as well as detailed information on how dIREKTION uses it.
- The right to request correction or updating of your personal data.
- The right to request deletion of your personal data. When dIREKTION receives a deletion request, several factors will be considered to evaluate whether dIREKTION should comply with this request.
- The right to request a restriction of the processing of your personal data, for example, when you believe that the personal data that dIREKTION holds about you is inaccurate.

All requests regarding your personal data should be directed to the Privacy Office. dIREKTION will respond to these requests within thirty (30) working days of receipt, unless otherwise required by applicable law. dIREKTION will take all reasonable steps to effectively correct or delete your personal data from its databases upon request, although dIREKTION may retain a copy for archival purposes in accordance with applicable law. Before providing you with data, correcting inaccuracies or deleting data, dIREKTION may request additional information to verify your identity or otherwise facilitate response to your request.

Compliance/contact us

dIREKTION complies with this **Privacy Policy**, as well as applicable laws, such as Canada's Personal Information Protection and Electronic Documents Act.

If you have any questions, complaints or concerns regarding the security or confidentiality of your personal data, we invite you to contact our Privacy Office. Where appropriate or required, dIREKTION will cooperate with relevant regulatory authorities to resolve complaints or questions relating to personal data.

Here are the contact details for our Privacy Office:

- Email address: infovieprivee@direktion.com

Additionally, you can contact our Privacy Officer for Canada:

- Name: Dora Manata
- Title: Responsible for the protection of personal information
- Email address: infovieprivee@direktion.com

Changes to this Privacy Policy

dIREKTION reserves the right to make occasional changes to this **Policy on the protection of personnel information legislation** and to inform you of dIREKTION's privacy practices.

The most recent version of this **Privacy Policy** was updated in September 2023.