



## Data Protection Privacy Policy

### What does it consist of?

The aim of this Privacy Policy is to **clearly explain** in **simple terms** and in a concise, transparent and intelligible way how POLYGLOT GROUP P.T.Y. LIMITED, POLYGLOT GROUP EUROPE S.L.U., POLYGLOT AFRICA PTY LTD, POLYGLOT GROUP INC and POLYGLOT GROUP EURL **trading as ANÁVO** (and hereinafter referred to as ANÁVO) **manage your personal data**.

This personal data may be obtained within the framework of the delivery of a service, a selection process, receipt of a service provided by you or if we manage them when you visit our website. Personal information that is collected and used is done so exclusively for the purposes established in the present policy.

This document guarantees the **safeguard of your rights**, confidentiality and security of the information you entrust in us, all in accordance with the legal obligations in force with regard to the protection of personal data and, especially, in compliance of the obligation for transparency according to the General Data Protection Regulation 2016/679 (hereinafter "GDPR"), the Privacy Act 1988 (Cth) (hereinafter "Privacy Act), the 13 Australian Privacy Principles (hereinafter "APPs") and the New Zealand Privacy Act 2020.

If you are not satisfied with any aspect of the present policy, please know that you have legal rights to tailor how we use your data, which have been described in the present policy.

### What does Personal Data mean?

Under the scope of this policy and the legal frameworks used as a reference, personal data is considered as any information relating to an identified or identifiable natural person. 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.

Personal data includes “sensitive information” which is information or an opinion about racial or ethnic origin, political opinions, memberships or a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a professional or trade association or a trade union, sexual orientation or practices, criminal records and health information.

ANÁVO only collects your personal data with your consent and if reasonably necessary for one or more of our functions or activities, or otherwise in accordance with the legal obligations in force with regard to the protection of personal data.

Where you provide your personal information personally, you consent to the collection of that personal information.

### **Who is responsible for the processing of your personal data?**

ANÁVO Company that is responsible for the processing of the personal data will depend on which of the following companies is the counterpart associated with the corresponding agreement:

**POLYGLOT GROUP P.T.Y. LIMITED trading as ANÁVO**

ACN: 088 338 523

Business address: 25 Burton Street, Glebe, NSW 2037, Australia

Telephone number: +61295184388

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT GROUP EUROPE S.L.U. trading as ANÁVO**

CIF B87014205

Business address: Avenida Josep Tarradellas, 38, 2, 08029, Barcelona, Spain

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +34934418751

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT AFRICA PTY LTD trading as ANÁVO**

2017 / 015025 / 07

Business address: 6 Spin St – CBD, Cape Town 8001, South Africa

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +27 71 111 3629

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT GROUP INC trading as ANÁVO**

EIN 352615452

Business address: Suite 400, 2150 Allston Way, Berkeley, CA

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +61 450 609 365

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT GROUP EURL trading as ANÁVO**

SIRET 838 088 532 00018

Business address: St Cloud (92210) 126, Bureaux de la Colline, 1 rue Royale, Paris, France

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +33 6 24 60 56 69

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

The interested party is informed that ANÁVO has appointed a Data Protection Officer (DPO) to whom you may indicate any and all questions relating to the processing of your personal data.

The interested party may contact the Data Protection Officer (DPO) via the following contact details: **[dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)**.

### **What kind of personal information does Anávo collect?**

ANÁVO may collect the following personal information:

**Clients' Personal Data:** which includes contact information in relation to the contact persons of your organisation (name, telephone number, job title or e-mail address) to guarantee an adequate range of services. What is more, we keep a record of our interactions which we use

to ensure that we send you pertinent and appropriate marketing communications. In the same way, we may safeguard additional financial and tax information such as when you interact with our financial and debt collecting teams. If, for any reason, we require any other personal data, we will inform you.

**The personal data of candidates in selection processes:**

Depending on the case and on the applicable legislation, we may collect information pertinent to your work application and Curriculum Vitae indicated below in order to be able to offer you work opportunities that are tailored to your professional interests and professional profile: name, age, contact information, professional path, training, legal status of foreigners, financial information in the cases in which we must verify your financial record, nationality, languages and social security number. What is more, you may opt to share other information of interest with us. Where applicable, and in accordance with the legislation and local requirements, we may also collect information relating to your health or to aspects relating to diversity, as well as data relating to criminal sentences. What is more, it is probable that we will obtain additional personal information as our relationship progresses.

**Personal data provided by the candidate, such as contacts for references:**

In order to offer our candidates appropriate professional opportunities suited to their professional goals, it is necessary for us to request and safeguard their contact information, so that we may contact you to request the candidates' references that you have provided and share his/her minimum contact data as a reference.

**Personal data of our suppliers and partners:**

We specifically collect a specific set of information from our suppliers and partners, such as the contact data of those responsible within your organisation in order to be able to communicate. This includes the names, telephone numbers, job titles and e-mail of those we interact with. Moreover, it is necessary to also collect their bank data in order to be able to pay for the services provided. This is always included as part of the agreement and signed contract with the supplier or partner.

**Personal data of users that visit our website:**

We collect the following personal information from ANÁVO website users through the corresponding forms: name, e-mail address, postal address, and telephone number when the user visits the website, registers, contacts ANÁVO or participates in ANÁVO studies or surveys. Additionally, we collect very specific data which we use to improve your browsing experience, as well as to help us with the management of our services. Among this can be found information

on how to use the website, the frequency with which it is accessed, the hours with the greatest traffic, the type of browser users choose, the place from which it is visited, the language in which the website is consulted, etc.

### **How do we obtain your personal data?**

ANÁVO may obtain your personal data as follows:

**Clients' Personal Data:** ANÁVO may obtain personal data in the following way:

**1. Receive it directly from the Client:**

- When the client contacts us by telephone and/or by e-mail.
- When ANÁVO contacts the Client by telephone, e-mail and/or promotional activities.

**2. Automatic collection:**

- Automatic collection of client data when they access the website.
- Automatic collection of client data when they read or click on the e-mails that we send or when they provide it to us.

**3. Received from other sources:**

According to the legal regulations, it is possible to request more information on the client, in general, from other sources, through due diligence or other market information mechanisms, among them:

- Market studies from third parties and through the analysis of online and offline resources (that we may carry out ourselves or entrust to other organizations we may hire).
- Lists of delegates in corresponding events.
- Limited sources and third parties (for example, through our candidates, as long as they provide us with their data as contact person with regard to references).

**Candidates' Personal Data - Selection Processes:** ANÁVO may obtain the data in the following way:

**1. Receive it directly from the candidate:**

- When the candidate leaves a physical copy of his/her Curriculum Vitae in our offices, at an event for the selection of personnel or a job fair.
- When the candidate sends his / her Curriculum Vitae by e-mail or in an interview.

- When the candidate introduces his/her data in the website or through a form, as part of the registration process.
- When the candidate applies to a position through a website of employment offers that redirects him/her to ANÁVO website.
- When the candidate registers or applies to a competition on social networks (Twitter, Facebook, etc.).

## **2. Automatic collection:**

- Automatic collection of the candidate's data when s/he accesses the website.
- Automatic collection of the candidate's data when s/he reads or clicks on the e-mails that we send to him/her or when he/she provides it.

## **3. Received from other sources:**

In accordance with the legal regulations, we may request more information on the candidate from other sources, in general, through due diligence or other market information mechanisms, among them:

- The contact persons with regard to references may give of personal information on the candidate.
- Our clients provide us with personal information on a candidate.
- When we carry out searches for possible candidates in external public sources, such as LinkedIn and/or other job portals.
- Twitter and Facebook provide us with your personal information displayed on those platforms when you click on "Like" on our website or when you follow us.
- If our profile reaches us through a supplier, it is possible that they inform us of your personal data.

### **Candidate References' Data: personal data of persons provided by the candidates, such as contact persons for reference purposes:**

- ANÁVO will only collect personal information in the case that a candidate designates it as a contact for reference purposes.

### **Suppliers and Partners' Personal Data:**

- ANÁVO will only collect our suppliers and partners' personal data during the contractual relationship or collaboration existing between them.

## **Website Users' Personal Data:**

- ANÁVO automatically collects our website users' data through cookies according to the specific configuration of the user's browser. If you wish to receive more information on cookies, please look at the Policy on Cookies of ANÁVO.

## **For what purpose do we process your personal data?**

ANÁVO will process your personal data for the following purposes:

### **Client's Personal Data:**

ANÁVO will process their clients' personal data in order to manage and guarantee the adequate fulfilment of the agreements and/or contracts signed between both parties, as well as to personalize our services to their needs.

#### **1. Provision of Personal Services:**

- Storage of your data, updating them when necessary in our database, in order to get in touch with you with regard to the provision of our services.
- Manage registers of our conversations and meetings, so that we may provide you with specific and personalized services.
- Carry out satisfaction surveys to the clients.
- Manage your data to carry out marketing campaigns.

#### **2. Marketing Activities:**

- According to the applicable legal standards, we will generally not request for your consent when we send marketing material to a corporate address, whether postal or e-mail.
- In the case that you do not agree with that indicated above, you have the right to opt not to receive the marketing material that we send you. You may consult further information on how to exercise your rights in the corresponding section in the present policy.
- It is important to indicate that to send direct marketing we are obliged to obtain your specific consent and we also have the obligation to keep registers that this consent has been received.
- If you do not agree with our marketing strategy, you have the right to withdraw your consent at any moment. You may consult further information on how to exercise it in the present Policy. No one is perfect, but we try to be.

- You should be aware that, although you opt not to receive our marketing communications, the possibility exists that we recover your data again through public sources within the framework of other different marketing campaigns. We will try to make sure that this does not happen, but if it does, we apologise in advance. In this case we would ask you to de-register once more.
- All of our marketing activities are based on what we believe will be helpful to our clients and candidates. But we are aware that we do not always get it right. On occasions we may use your data to show you advertising material of ANÁVO or other content from other websites, such as, for example, Facebook.

If you do not want us to use your data to this end, you must deactivate the option “advertising cookies” (consult our Policy on Cookies). However, there is still a possibility that you continue to see advertisements of ANÁVO, but, in any case, it will not be a question of personalised advertising, but that it is directed towards an anonymous public.

### **3. For the exercise or defence of a right in legal proceedings**

- In exceptional cases, we will use your personal data for the exercise or defence of a right in legal proceedings.

#### **Personal data of candidates in a selection process:**

ANÁVO will process personal data of the candidates in selection processes for the following purposes:

#### **1. Provision of Personal Services in the Selection of personnel:**

Below we indicate different ways in which we may use and process your personal data in order to manage personalized services for the selection of personnel, where applicable and according to the legal requirements:

- To collect the candidate’s data through you and from other sources, such as professional networks like LinkedIn.
- To store their data and update them when necessary in our data base, so that we may get in touch with the candidate with regard to a personnel selection process.
- To provide personnel selection services and facilitate this process.
- To evaluate their data with regard to the professional offers that we consider adjust to their professional profile.
- To send their information to clients to apply for a job or evaluate their application.
- To offer them the possibility of sending their Curriculum Vitae, to apply for a job on-line or register for alerts for offers that we consider may be of interest to them.



- Comply with our obligations resulting from the contracts that we have signed with the candidate.
- Comply with our obligations resulting from the contracts that they have signed with ANÁVO and third parties with regard to their selection as a candidate.
- To carry out satisfaction surveys among our clients.
- To verify the data provided by the candidate, using third party resources such as psychometric evaluations or aptitude tests, or to request information such as references, qualifications and possible criminal sentences, as appropriate and according to legal requirements.
- To comply with our legal obligations.
- To process their data in order to send them specific and pertinent marketing material or other communications that we consider of probable interest to them professionally.

## **2. Marketing Activities:**

It is possible that we will periodically send you information that we consider believe may be of interest to you professionally or request you to help us to share employment offers with other candidates. In particular, we may use your data for the purposes outlined below, when applicable and according to the legal requirements:

- To offer you our personnel selection services.
- To send you reports, promotions, offers, events, and general information that we believe may be of interest to you professionally.
- To publish promotional information of your data on the website of ANÁVO to inform of our success stories, for which it will be necessary to always obtain your express consent beforehand.
- To send you information on determined discounts and offers to which you have the right in accordance with your relationship with ANÁVO.
- It is important to point out that for the sending of direct marketing we are obliged to obtain your specific consent and we will also have the obligation to keep registers of the fact that this consent has been received.
- If you do not agree with our marketing strategy, you have the right to withdraw your consent at any time. You may consult further information on how to do so in the present Policy. No one is perfect, but we try to be. You should be aware that, although you have opted not to receive our marketing communications, the possibility exists that we recover your data again through public sources within the framework of other different marketing campaigns. We will try to make sure that this does not happen, but if it does, we apologize in advance. In this case we would ask you to de-register once more.

- All of our marketing activities are based on what we believe helps our clients and candidates most, but we are aware that we do not always get it right. On occasions we may use your data to show you advertising material for ANÁVO or other content from other websites, such as, for example, Facebook. If you do not want us to use your data to this end, you must deactivate the option “advertising cookies” (consult our Policy on Cookies). However, there is still a possibility that you continue to visualize the advertisements of ANÁVO, but, in any case, it will not be a question of personalized advertising, but that it were directed toward an anonymous public.

### **3. For the exercise or defence of a right in legal proceedings**

- In exceptional cases, we will use your personal data for the exercise or defence of a right in legal proceedings.

### **4. Control of equal opportunities and other personal data of a sensitive nature**

- Our commitment is to guarantee that our selection processes adjust to our equal opportunity standards. Part of the data that we may collect on the candidates in specific cases and according to legal regulations is found under the title “information in relation to the diversity and equal opportunities”. This may consist of personal information on gender, disabilities, age, sexual orientation, religion or other beliefs, ethnic origin, as well as your socioeconomic context. When applicable, we will use this information dissociated from identifying elements to control that we comply with our equal opportunities policy and the corresponding legal legislation. It is possible that we will inform on this data conveniently dissociated when legally appropriate to clients when we are obliged to do so through contracts or when the client specifically requests said information to comply with their personnel selection procedures and control of equal opportunities.
- The present information is named by the legal legislation as personal information of a “sensitive” nature and is governed by stricter data protection regulations. Thus, we must expressly obtain their consent before being able to use it. For this, we refer to a prior consent clause, so that you must manifest your consent expressly and unequivocally to the collection and use of this sensitive information.
- In the same way, we may collect other personal data on you of a sensitive nature, such as information related to your health, religious affiliation or data on criminal sentences

in the appropriate cases and according to law, and whenever necessary to be able to apply to an offer. Under no circumstances will we do it without your explicit consent.

- If you do not agree to the above, you have the right to withdraw your consent at any time. You may consult further information on how to exercise this in the present Policy.

## **5. Profiling**

- Currently all our activities involve the taking of decisions by people in the professional selection processes, the possibility exists that in the future we will use completely automated technology, such as specialized systems or automatic learning, to carry out the selection processes of candidates from the start to the finish, when applicable and according to legislation.
- When applicable, we will obtain your consent to carry out all or some of the said activities. If you do not give your consent for the elaboration of profiles, your application will be examined manually in relation to the offers to which you apply, but your profile will not be automatically taken into account for other jobs, which will probably reduce the possibilities of finding one.
- You have the right to withdraw your consent at any time. You may consult further information on how to exercise this in the present Policy.

### **Personal data of persons facilitated by the candidates, such as contact persons for the purpose of references:**

ANÁVO will process personal data facilitated by the candidates, such as contact persons for references, for the following purposes:

- In the case that our candidate or possible worker has designated a contact person for the purpose of references, we will contact you to request them. This is an important element of the quality control process to which our candidate is subjected and could suppose the difference between getting the job or not.

### **Personal data of the suppliers:**

ANÁVO will process personal data of their suppliers in order to manage and guarantee the adequate compliance with the agreements and/or contracts signed between both parties:

- To store their data and update it when necessary in our database, so that we may get in touch with our suppliers in relation to our contracts.
- To request their assistance or their services.
- To comply with specific legal obligations.
- To help us to direct suitable marketing campaigns.
- In exceptional cases, for the exercise or defence of a right in legal proceedings.
- Generally, we will not request their consent when we send marketing communications to a corporate address, whether postal or e-mail.
- If you do not agree to the above, you have the right to withdraw that consent at any time. You may consult further information on how to exercise this in the present Privacy Policy.

#### **Personal data of Users that visit our Website:**

ANÁVO will process the personal data of the Users of our website in order to improve their browsing experience on our website; for example, we analyse their latest search criteria to help us offer them the job offers or the candidates that we believe may be of their interest, or to help us in managing our services.

For more information on Cookies, including the way in which we use them and the options you have available, click on our [Policy on Cookies](#).

#### **Which recipients may we share of your personal data?**

The interested party's personal data may be shared to the following recipients when applicable and in accordance with the legislation in force:

- ANÁVO companies.
- Public Administrations and Bodies when tax, labour, social security or any other applicable legislation requires it.
- Possible employers, recruitment agencies, third party partners, job notice boards and job opportunity aggregators to increase your probabilities of achieving the adequate professional post.

- Companies in charge of data processing, such as suppliers that provide services to ANÁVO as external consultants and professional advisors, lawyers, auditors, accountants, computer specialists, reference checkers, qualifications and criminal convictions when they arise from, and conform to, the legislation.
- By default, ANÁVO will not do international data transfers with countries that are not considered as safe countries in terms of data protection according to the legislation applicable to each of ANÁVO's entities. If international data transfers are necessary for the provision of the service, ANÁVO will take reasonable steps to ensure that personal information sent overseas is protected by comparable privacy standards.

These reasonable steps include but are not limited to the use of the Contractual Clauses adapted by the European Commission and the EU-USA Privacy as a guarantee of those transfers carried out to countries that do not have an adequacy decision from the European Commission. When it comes to international transfers In any case, the third parties with whom certain data of a personal character is shared will have previously confirmed the adoption of technical and organizational measures that are adequate for the correct protection of them.

- Under no circumstances does ANÁVO sell data to third parties.

### **For how long will we keep the personal data?**

ANÁVO will keep the personal data for the period of time that it is reasonably necessary bearing in mind the services we provide and the time for which you need it, the need to respond to questions that are posed or resolve problems, carry out improvements and comply with the requisites for storing information that the applicable legislation requires (for example, on request from a tax authority or in relation to possible lawsuits).

This means that your personal data may be conserved for a reasonable period of time including after the interested party had stopped receiving the services of ANÁVO or had stopped using the Website. Following this period, the personal data will be blocked from all ANÁVO systems or we will remove them unless we believe in good faith that the legislation requires us to conserve them.

### **What gives us the legitimacy to process personal data?**

ANÁVO has the following legitimate bases for being able to process personal data:

## **Execution of the contract**

The legal basis for the processing of personal data of the interested party that is collected, is to enter into or comply with the execution of a contract, in order to comply with the obligations, we assume on providing a service to you, or in order to take measures that you request from us to enter into a contract with us, it will be necessary for us to process your personal data. In this way, the interested party is obliged to provide the data that is necessary for its execution. In the case that the data were not provided, it will not be possible to carry out the service.

## **Legal obligations**

Compliance of a legal obligation given that we are subject to certain legal requirements that may require from us that we process your personal data. The possibility also exists that we are obliged, by law, to divulge your personal data to a regulatory body or the police authorities.

## **Legitimate interest**

In accordance with article 6, section 1, letter f), of the GDPR it is authorized to process your data when it is necessary to satisfy the legitimate interests pursued by ANÁVO or by a third party, as long as over said interests the interests or rights and liberties of the interested party do not prevail that require the protection of personal data.

According to the above, ANÁVO, or a third party, will have the need to process your personal data for our legitimate interest or the legitimate interest of a third party, providing that we have made it clear that said interest is not cancelled by your rights and liberties, including your right for your personal data to be protected. Our legitimate interest includes responding to requests from you or from a third party, to optimise the experience and satisfaction of the clients and users of our website, offer them information on our services and guarantee that our activities are carried out in an adequate way.

## **Consent**

Consent in specific circumstances; it is possible that we will request your consent to process your personal data in a specific way. According to article 4, section 11, of the GDPR, consent is any expression of free, specific, informed and unequivocal will by which the interested party accepts, either through a declaration or clear affirmative action, the processing of personal data that concerns them, that is:

- You must give us your consent freely, without us being able to exercise any kind of pressure on you.

- You ought to be aware of what you are consenting to, for which we will ensure that we send you sufficient information.
- You must grant us your consent through positive and affirmative action: it is probable that we will include a box that must be ticked to comply with this requisite in a clear and unequivocal way. We will maintain a register of the consent that you have given in this way.

When we process your personal data with your consent, you have the right to withdraw your consent at any time. You may do this in accordance with the procedure indicated in the present policy.

### **How do we protect your personal data?**

The POLIGLOT GROUP informs you that they have adopted the technical and organizational measures necessary to maintain the required level of security and confidentiality with regard to personal data processed and, likewise, has put the necessary mechanisms in place to avoid, as far as possible, unauthorized access, improper use, removal, illicit modifications and loss of data.

### **What are your rights in relation to personal data?**

In accordance with the GDPR you have a series of rights of a protective nature which are indicated below:

- |                                    |  |
|------------------------------------|--|
| <b>The right of access.</b>        | You have the right to obtain confirmation on whether in ANÁVO we are processing personal data relating to you, or not, as well as how to gain access to the personal data that ANÁVO has of yours. |
| <b>The right to rectification.</b> | You have the right to request that ANÁVO rectifies the personal data when they are inaccurate or to complete them when they are incomplete.  |
| <b>The right to erasure.</b>       | You may request us to remove the personal data when, among other motives, the data is no longer necessary for the purposes for which it was collected.   |

**Right to restriction of processing.** You have the right to request the limitation of the data processing, in which case we will only conserve them for the year or for claims advocacy.

**The right to data portability.** You have the right to receive the personal data in a structured format, for common use and machine readable, and to transfer them to another person in charge when the processing is based on consent or on a contract and is carried out through an automated means.

**Right to object.** You may oppose the personal data being object of processing based on public or legitimate interest pursued by ANÁVO, including profiling. In this case, ANÁVO will no longer process the data, except for compelling legitimate grounds or to exercise or defend possible claims.

**Automated individual decision-making.** You have the right not to be the subject of a decision based solely on automated processing, including the profiling that gives rise to legal effects with respect to you or affects you significantly in a similar way.

**Right to lodge a complaint.** You have the right to make a claim before the Spanish Data Protection Agency.

You may exercise your rights or withdraw your consent for the processing of your personal data, when the consent is the legal basis for said processing, by contacting us:

#### **POLYGLOT GROUP P.T.Y. LIMITED**

ACN: 088 338 523

Business address: 25 Burton Street, Glebe, NSW 2037, Australia

Telephone number: +61295184388

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

#### **POLYGLOT GROUP EUROPE S.L.U.**

CIF B87014205

Business address: Avenida Josep Tarradellas, 38, 2, 08029, Barcelona, Spain

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +34934418751



Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT AFRICA PTY LTD**

2017 / 015025 / 07

Business address: 6 Spin St – CBD, Cape Town 8001, South Africa

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +27 71 111 3629

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT GROUP INC**

EIN 352615452

Business address: Suite 400, 2150 Allston Way, Berkeley, CA

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +61 450 609 365

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

**POLYGLOT GROUP EURL**

SIRET 838 088 532 00018

Business address: St Cloud (92210) 126, Bureaux de la Colline, 1 rue Royale, Paris, France

*(our office is temporarily close due to COVID-19 restrictions, please contact the DPO by email)*

Telephone number: +33 6 24 60 56 69

Data Protection Officer (DPO) Contact: [dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

To exercise your rights contact us and we will try to process your request without undue delay and, in any case, within one month without prejudice to the extensions that the legislation permits.

It is important that the personal information that we preserve on you be exact and up to date. Please keep us informed in the case that your personal data changes during the period in which we keep your data.

### **Quality of the data**

The data provided by the user must be exact and truthful. In all cases, it is the user who has the obligation to inform ANÁVO of any modification in their data in order that they may keep them updated at all times.

### **Update of the Privacy Policy**

ANÁVO may modify and update the present Privacy Policy at any moment without prior notice. Please check that you are aware of our Privacy Policy in order to be informed at all moments of the information contained therein.

This policy was last **reviewed** by the Head of Compliance on the 25/03/2021.