



an
NTT Communications
Company

[Arkadin Privacy Policy]

Compliance department

Effective as of **May 25th, 2018**



Arkadin (hereinafter referred to “Arkadin”, “we”, “us” or “our”) commits to protect the privacy of Arkadin employees. This policy describes Arkadin’s privacy statement about the process of personal data of employees located in European Union by Arkadin, as data controller.

OBJECTIVES

Data protection is a long European story that started at the end of the 50’s with the European convention of Human rights that adopted the fundamental right to privacy. With the creation of the first computer and the awakening of the internet, the European authorities decided to adopt one of the world’s first major privacy laws in 1995: the EU’s Data Protection Directive. This directive required companies to be transparent about their personal data processing, have a legitimate purpose for their use of that data and exercise care in handling data.

With rapid changes in technologies such as ‘Cloud computing’ being used around the world and the development of large companies processing huge amounts of personal data, an update was necessary. This is one of the reasons why EU legislators adopted the “General Data Protection Regulation” (GDPR) in 2016. This new European privacy law will keep privacy law relevant in a world where far more data is collected than ever before.

On May 25, 2018, the GDPR will come into force and will replace the 1995 EU Data Protection Directive. This new European privacy law will (i) create a new landscape for European data protection at a global level; (ii) intend to strengthen the rights that individuals have regarding personal data relating to them and (iii) seek to unify data protection law across Europe, regardless of where data are processed.

The purpose of this document is to explain how Arkadin will comply with this new regulation.

PERSONAL DATA COLLECTION AND USE

‘Personal data’ means 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 (Article 4 of the EU General Data Protection Regulation (GDPR)).

Required personal data

For the performance of the employment contract, Arkadin may require employees to provide personal data such as:

- Civil status, identity and identification data including gender, name, surname, contact details (phone number, personal and professional e-mail address, postal address), date and place of birth, nationality, identification number, identity reference (NIC, passport, driving licence, work visa and associated information) and picture.
- Personal life including Family situation, number of children and age of children.
- Professional life including job title, role and attribution, CV, Professional training, distinctions, employment, date and conditions of employment, desiderata of the employee in terms of employment, disciplinary sanction, validation of acquired experience, administrative follow-up of employees’ medical examination, occupational diseases or accidents, professional evaluation, career simulation, qualification, level of education and diplomas (date of obtaining, number of jobs obtained since).
- Economic and financial situation including revenues, fiscal situation, monthly charges, bill payment information, data relating to the payment transaction and data bank.
- Connection data and use of business tools including IP address.

This generic list may vary according to the location of the employee with due compliance to applicable regulations.

Special categories of personal data:

Arkadin processes the following “special categories of personal data” (Article 9 of the GDPR):

- Social security number: The processing of this special category of personal data is necessary for the purposes of carrying out the obligations and exercising specific rights of Arkadin in the field of employment and social security and social protection law.
- Biometrics data (fingerprint): Arkadin processes fingerprint of its employees to allow them to have a secure access to their office (Madrid).

The provision of the required personal data and the special categories of personal data mentioned above is a requirement necessary to enter into the employment contract with Arkadin. Any individual who would like to become an Arkadin employee shall provide these personal data. In case of failure to provide these personal data, the employment contract cannot be properly performed.

Additional information:

For the performance of corporate social gathering such as annual meeting, entertainment event (happy hour) and business trips and workshop and kick off events, Arkadin may also require additional information from the employees including voice, picture, video, outfit size and eating habits.

Employees testimonials: Arkadin may posts lists of employees’ name and testimonials in its web site or brochures that may contain personal information such as employees’ name and title, voice, picture, video.

Arkadin always obtains the prior consent of any of its employees before publishing their testimonials and personal data.

Processing of personal data:

‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; (article 4 of the GDPR).

Categories of processing made by Arkadin:

Personal administration: Arkadin may process personal data of its employees to manage (i) the global directory and org chart, (ii) employees career records; (iii) employees statistical status; (iv) equipment and tools available to employees records; (v) foreign records; (vi) tax data records; (vii) mutual, pension, medical visit and handicaps records; (viii) urgency records (personal emergency contact and rescue worker contact); and (ix) lunch resources records.

Payroll management and benefits records: Arkadin may process personal data of its employees to manage (i) payroll records such as wages, bonus, overtime compensation, withholding tax and expenses; (ii) tax and social security records; (iii) severance pay records; and (iv) incentive program records.

Personal management: Arkadin may process personal data of its employees to manage (i) employees career, performance and mobility (validation of acquired experience, promotions and demotions, references, appraisal; employment projection); (ii) trainings and surveys; (iii) employees personal events such as birthday and family event and (iv) work planning.

Event management: Arkadin may process personal data of its employees to manage classic business travel records and temporary business trips.

HR Marketing: Arkadin may process personal data of its employees to manage testimonial and interviews.

Legal and compliance matters: Arkadin may process personal data of its employees to (i) commit with legal requirements such as implementation and update of fight against fraud and other illegal activities records and (ii) manage litigation.

Office management and access control: Arkadin may process personal data of its employees to manage (i) offices and data center access; (ii) records such as package receipt, equipment loan, visitor or road traffic offences and infringement with business car; (iii) excel trace files such as registered mail files, parking badges files, car fleet files, meal badges files, hotel reservation files and business car files.

Legal basis for the processing:

1/ Contract: The processing may be necessary for the performance of a contract to which the data subject is party. The major part of Arkadin processing is based on this legal basis.

2/ Legitimate interests: The processing may be necessary for the purposes of the legitimate interests pursued by Arkadin. It is our legal basis regarding training and survey reports, control of access processing, personal emergency contact processing, business trip processing, any office management processing, access and tools provided to employees reports.

3/ Legal matters: The processing is necessary to comply with a legal obligation to which Arkadin is subject.

Personal data retention:

Arkadin retains and use personal data of its employees as needed to fulfil the purposes for which it was collected and as necessary to (i) comply with Arkadin business requirements; (ii) comply with legal obligation; (iii) resolve disputes and/or (iv) enforce contract with its employees.

Confidentiality statement:

Arkadin assigns to its employees confidential account access details such as an access number and a pin code. Employees are responsible for maintaining the confidentiality of their login name, password and/or pin code and for restricting access to their account. Employees are responsible for (a) the use of their personal data or access to the account by any individual with whom employees (i) share their login name, password and/or pin code, or (ii) authorize to use their account, and/or (b) any unauthorized use or access that results in whole or in part from employees failure to protect the confidentiality of their login name, password and/or pin code.

SHARING AND TRANSFER OF PERSONAL DATA COLLECTED

The personal information that employees submit to Arkadin remains their property. Arkadin does not sell or rent personal information to unrelated third parties nor transfer data within Arkadin without proper purpose.

Arkadin may share personal data collected to the following recipients or categories of recipients:

- **Human resources department:** Arkadin may share employees' personal data to individual belonging to the Human Resources department who are authorized to receive those data.
- **Arkadin Affiliates:** Arkadin may share employees' personal data with Arkadin Affiliates for example via org chart, intranet and directory. "Affiliate" refers to, now or in the future, any other entity that (i) directly controls; (ii) is under common control with; or (iii) is controlled by Arkadin. An entity shall be considered as controlling another entity if it owns, or controls, at least fifty (50) percent of the voting stock or other ownership interest of the other entity.
- **Arkadin service providers:** Arkadin may share limited employees' personal data with service providers which provide services on behalf of Arkadin. The list is available at first request to your dedicated HR correspondent.

If Arkadin discloses personal information to third parties, such third parties will be required to comply with Arkadin code of conduct and sign a data processing agreement with Arkadin.

- **Legal disclosure:** Arkadin may disclose personal data (i) if required by law or if Arkadin reasonably believes that disclosure is necessary to protect Arkadin's rights; (ii) to comply with a legal process; (iii) in case of legal proceeding, litigation or request of public authorities; and/or (iv) in case of restructuring, merger or acquisition.

Personal data may be transferred, accessed and stored globally as necessary for the uses and disclosures stated above in accordance with this policy. By providing personal data, employees consent that Arkadin transfers employees' personal data to its Affiliates globally and to third party entities that provide services to Arkadin.

Arkadin has implemented appropriate safeguards for transfers of personal data originating from the European Economic Area ("EEA") to Arkadin affiliates and unaffiliated third parties located outside the EEA.

EMPLOYEES RIGHTS EXERCISE

- Right to be informed (article 13, 14 and 34 of the GDPR)

This right compels Arkadin to provide "fair processing information", like through a privacy notice. The GDPR requires Arkadin to provide more detailed information as to the "how and why" of the processing of personal data and on the rights of the data subjects. It also includes the right for the data subjects to be informed in the event of data breach to allow them to take appropriate action.

- Right of access (article 15 of the GDPR)

You have the right to obtain confirmation that your data are being processed and access them. The right of access gives any data subject the right to ask for a copy of its data in a human readable form.

- Right to rectification (article 16 of the GDPR)

As employees, you have the right to have inaccurate data corrected and/or incomplete data completed with supplementary data.

- Right to erasure (article 17 of the GDPR)

You have the right to have personal data erased if Arkadin has no lawful basis to continue processing the data. In some cases, or for some types of personal data, Arkadin may decide not to erase the data but instead restrict its use (for example, it can only be used in the event of a legal claim).

- Right to restrict processing (article 18 of the GDPR)

When processing is restricted, Arkadin may store personal data but not further process it. It is allowed to retain just enough information about the individual to ensure that the restriction is respected in the future.

- Right to data portability (article 20 of the GDPR)

You have the right to receive personal data which you provided to Arkadin in a commonly used machine-readable format, so that you can share it with a different organization.

- Right to object (article 21 of the GDPR)

In some circumstances, you have the right to object to your personal data being used for a particular purpose, for example to send you direct marketing or to make automated decisions.

- Right to not be subject to an automated individual decision-making (article 22 of the GDPR)

The GDPR provides safeguards against the risk that a potentially damaging decision is taken without human intervention.

Regarding those rights, Arkadin has a dedicated team to which data protection related enquiries may be directed. For any enquiries, please refer directly to privacy@arkadin.com

Any request will be addressed with care within a reasonable timeframe.

PRIVACY POLICY UPDATES

Arkadin may change this privacy policy. In this case, Arkadin will provide notification of the material changes through its web site at least thirty (30) days prior the changes taking effect.

INFORMATIONS ABOUT ARKADIN

Any enquiries about this privacy policy may be sent to privacy@arkadin.com

Data controller: Arkadin European Affiliates

Arkadin Benelux SA	BELGIUM
Arkadin Czech Republic sro	CZECH REPUBLIC
Arkadin SAS	FRANCE
Arkadin International SAS	FRANCE
Arkadin Germany GmbH	GERMANY
Arkadin Ireland Limited	IRELAND
Arkadin Italy S.R.L	ITALY
Arkadin B.V	NETHERLANDS
Arkadin Norway AS	NORWAY
Arkadin Poland SP z.o.o	POLAND
Arkadin Portugal, Unipessoal LDA.	PORTUGAL
Arkadin Spain Servicios de teleconferencia S.L.U	SPAIN
Arkadin AB	SWEDEN
Arkadin Swiss AG	SWITZERLAND
Arkadin (UK) Limited	UK

Arkadin SAS is Arkadin's data protection representative within the European Economic Area and Switzerland.

The lead authority is CNIL (<https://www.cnil.fr>). You have the right to lodge a complaint to the supervisory authority.

Arkadin Data Protection Officer (DPO) may be contacted at the following address:

Arkadin SAS – Data Protection Officer – 153 rue de Courcelles, 75017 Paris, France.

About Arkadin

Founded in 2001, Arkadin is one of the largest and fastest growing collaboration services providers in the world. With a vision rooted in the belief that progress emerges from people's desire to share, Arkadin offers a complete range of remote audio, web, and video conferencing and Unified Communications solutions. The services are delivered in the SaaS model for fast, scalable deployments and a high ROI. Its global network of 52 operating centers in 32 countries has dedicated local-language support teams to service its 37,000 customers.

To find out more about Arkadin please visit:

www.arkadin.com

