

# Privacy Policy

Your trust is extremely important to us. Our privacy policy explains how we collect, store and handle your personal data.

DIGITALGATE SARL is committed to protecting your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. This is the standard privacy policy that applies to all DIGITALGATE SARL products and solutions. When we use "DIGITALGATE SARL", "we", "us" or "our" in this privacy policy, we are referring to the relevant DIGITALGATE SARL product or solution used for processing your data. When you use a product or service with us, or enter into a working relationship with us, we will tell you which DIGITALGATE SARL solution you are using.

This Privacy Policy is written in English and French. The French version shall prevail in case of any discrepancies.

## What is the purpose of this document?

This privacy policy describes how we collect and process your personal data during and after your working relationship with us, in accordance with the applicable data protection laws, in particular the European General Data Protection Regulation (GDPR), Central African Republic Data Protection Act and other applicable data protection legislation.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and notices and is not intended to override them.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## The data we collect about you

**Personal data** means any information relating to an identified or identifiable individual, directly or indirectly, by reference to a name, an identification number, or one or more factors specific to that individual. It does not include data where the identity has been removed (anonymous data).

**Processing** means any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including, but not limited to: collecting, recording, organizing, adapting, extracting, copying, consulting, systematizing, accumulating, storing, clarifying (updating, changing), organizing, using, transferring (distributing, providing, accessing), depersonalizing, blocking, encrypting, deleting, erasing, destroying personal data.

We may **process** different kinds of personal data about you which we have grouped together as follows:

Category Typical	Items
Identity data	Full name, date, city & country of birth, citizenship (nationality), sex, marital status, occupation, name of employer, employer address, full name of father and mother, your title on job, TIN number, yellow fever vaccination status
Travel and/or passport data	Type, number, issue & expiry dates of the passport and/or other identity document (included but not limited: identity document of a foreign citizen, internal passport and etc.); visa category; travel itinerary
Contact data	Email, phone, postal address and code, corporate email
Payment data	Amounts paid, masked card details, transaction IDs
Biometric data	Passport photo & live facial image
Technical data	IP address, logs, device & browser info, cookies

## How we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. Where we need to perform the contract, we are about to enter into with you, or have entered into with you.
2. Where we need to comply with a legal or regulatory obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

In the event that the requirements of the law require consent to the processing of personal data and/or cross-border transfer of personal data, we will request it from you.

We process your personal data for the **purposes** of:

- concluding and performance contracts for the provision of paid services that you conclude with us by joining the Offer posted on our website;
- submitting applications and documents for using services - where applicable;
- to process and deliver a service on behalf of a third party (e.g. public body or regulatory body);
- informing you about the status of your order;
- sending you offers;
- notifying you about changes to our terms or privacy policy;
- asking you to leave a review or take a survey;
- to administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- for any other purposes directly or indirectly related to the execution of the agreement on accession to the public Offer on our website;
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- to use data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- conducting surveys, statistical and marketing research, processing the information received, including the possibility of commercial use of the results of these surveys and research;

- to make suggestions and recommendations to you about goods or services that may be of interest to you (marketing).

### **Lawful basis for processing including basis of legitimate interest:**

- Performance of a contract with you;
- Necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
- Necessary to comply with a legal obligation;
- Necessary for our legitimate interests:
  - providing our business services;
  - to study how customers use our products/services, to develop them and grow our business and to inform our marketing strategy;
  - for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise;
  - to define types of customers for our products and services, to keep our website updated and relevant;
  - to develop our products/services and grow our business.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Where we need to process personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

### **How is your personal data collected?**

We use different methods to collect data from and about you, including through:

- Direct interactions. You may give us your personal data by filling in forms, corresponding with us by post, phone, email or otherwise, or using our products and services. This includes personal data you provide when you:
- Enquire about products and services;
- Sign-up to and use our products and services;
- When we conduct assessment or inspection services;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey; or
- Give us some feedback.

**Third party interactions.** We may receive your information from a third party. We will always ensure that the data has been collected and shared with us in accordance with our legal obligations.

**Automated technologies or interactions.** As you use our website, products and services, we may automatically collect personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details, including information about the cookies we use. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out above.

<b>Categories of recipients</b>	<b>Reason for sharing</b>
Service providers	We work with service providers that work on our behalf which may need access to certain personal data to provide their services to us. These companies include those we have hired to operate the technical infrastructure that we need to provide service, assist in protecting and securing our systems and services.
Payment processors	We will share your personal data with our payment processors as necessary to enable them to process your payments.
Advertising partners	We and our advertising partners process certain personal data to help us understand your interests or preferences.
Professional advisors (legal advisors, accounting etc. bound to confidentiality)	Our legitimate interests in conducting and supporting our regular business activities.
Potential business acquirers and business transferee(s)	If necessary and required for successfully transferring our business or for the purposes of mergers and acquisitions, your Personal Data may be disclosed to the specified acquirers and their representatives and/or legal counsels. This is done based on our legitimate interests to sell and reorganize our business activities.
Law enforcement and data protection authorities	We disclose your personal data to law enforcement and data protection authorities only if we are under a duty to disclose or share these data in order to comply with legal obligations (for example, if required to do so under applicable law, by a court order or for the purposes of prevention of fraud or other crime).

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Where the processing of personal data requires prior consent and the data subject is a minor, the processing of data is lawful only if and to the extent that the consent is given or authorized by the holder of parental responsibility over the child. The Operator has the right to require confirmation that consent has been given or authorized by the person exercising parental responsibility

## **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Data retention**

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, regulatory, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Your data protection rights

We would like to make sure that you are fully aware of your data protection rights. Every user is entitled to the following:

- **The right to access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **The right to rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **The right to erasure** of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **The right to object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **The right to object to direct marketing**. You also have the right to object where we are processing your personal data for direct marketing purposes. You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.
- **The right to restrict the processing** of your personal data. This enables you to ask us to suspend the processing of personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **The right to data portability** of your personal data – you can request our company to transfer the data we have collected to you or a third party. We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **The right to withdraw your consent** to the processing. You have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please

contact [info@digitalgateca.com](mailto:info@digitalgateca.com). Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you make a request, we will respond to you within 30 days. If you would like to exercise any of these rights, please contact us at [info@digitalgateca.com](mailto:info@digitalgateca.com).

### **Privacy policies of other websites**

DIGITALGATE SARL website contains links to other websites. Our privacy policy applies only to our website. If you click on a link to another website, you should read their privacy policy.

### **Changes to this privacy policy**

We keep our privacy policy under regular review and place any updates on this page. This privacy policy was last updated on 12.19.2025

### **Contact details**

If you would like to exercise one of the aforementioned data protection rights, please contact our Data Protection Officer by email: [info@digitalgateca.com](mailto:info@digitalgateca.com)