

PRIVACY POLICY (CONTRACTOR)

English Language Version

J. Sallinger Ltd., trading as DNX360

Registered Address: 128 City Road, London, EC1V 2NX, United Kingdom

Company Registration Number: 12797704

Primary Notice Email: legal@DNX360.com

Main Website: www.DNX360.com

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ENGLISH

Our Privacy Policy for SMB Clients (the "Policy") is drafted exclusively in the English language and constitutes the sole governing text with respect to the processing of personal data relating to SMB clients. Any engagement with DNX360 as an SMB client implies full and unconditional acceptance of the applicable Policy, as reproduced below.

By engaging with DNX360 as an SMB client, the SMB client acknowledges that it has read, understood, and accepted this Policy.

FRANÇAIS

Notre Politique de Confidentialité applicable aux clients PME (la « Politique ») est rédigée exclusivement en langue anglaise et constitue le seul texte de référence applicable en matière de traitement des données à caractère personnel relatives aux clients PME. Toute relation avec DNX360 en qualité de client PME emporte acceptation pleine et entière de la Politique en vigueur, telle que reproduite ci-dessous.

En s'engageant avec DNX360 en qualité de client PME, le client PME reconnaît avoir lu, compris et accepté la présente Politique.

NEDERLANDS

Ons Privacybeleid voor KMO-kanten (de "Policy") is uitsluitend opgesteld in de Engelse taal en vormt de enige toepasselijke referentietekst met betrekking tot de verwerking van persoonsgegevens van KMO-kanten. Elke samenwerking met DNX360 als KMO-klant houdt de volledige en onvoorwaardelijke aanvaarding in van de geldende Policy, zoals hieronder weergegeven.

Door met DNX360 samen te werken als KMO-klant erkent de KMO-klant dat hij deze Policy heeft gelezen, begrepen en aanvaard.

DEUTSCH

Unsere Datenschutzrichtlinie für KMU-Kunden (die „Policy“) ist ausschließlich in englischer Sprache abgefasst und stellt den einzigen maßgeblichen Referenztext im Hinblick auf die Verarbeitung personenbezogener Daten von KMU-Kunden dar. Jede Zusammenarbeit mit DNX360 als KMU-Kunde gilt als vollständige und vorbehaltlose Annahme der jeweils geltenden Policy, wie nachstehend wiedergegeben.

Mit der Zusammenarbeit mit DNX360 als KMU-Kunde bestätigt der KMU-Kunde, dass er diese Policy gelesen, verstanden und akzeptiert hat.

ESPAÑOL

Nuestra Política de Privacidad para clientes PYME (la "Policy") está redactada exclusivamente en inglés y constituye el único texto rector aplicable en materia de tratamiento de datos personales relativos a los clientes PYME. Cualquier relación con DNX360 en calidad de cliente PYME implica la aceptación plena e incondicional de la Policy vigente, tal como se reproduce a continuación. Al colaborar con DNX360 en calidad de cliente PYME, el cliente PYME reconoce haber leído, comprendido y aceptado la presente Policy.

ITALIANO

La nostra Informativa sulla Privacy per clienti PMI (la "Policy") è redatta esclusivamente in lingua inglese e costituisce l'unico testo di riferimento applicabile in materia di trattamento dei dati personali relativi ai clienti PMI. Qualsiasi rapporto con DNX360 in qualità di cliente PMI comporta l'accettazione piena e incondizionata della Policy vigente, come riportata di seguito.

Instaurando un rapporto con DNX360 in qualità di cliente PMI, il cliente PMI dichiara di aver letto, compreso e accettato la presente Policy.

DANSK

Vores privatlivspolitik for SMV-kunder ("Policy") er udelukkende udarbejdet på engelsk og udgør den eneste gældende referencetekst vedrørende behandling af personoplysninger om SMV-kunder. Ethvert engagement med DNX360 som SMV-kunde indebærer fuld og ubetinget accept af den gældende Policy, som gengivet nedenfor.

Ved at indgå samarbejde med DNX360 som SMV-kunde bekræfter SMV-kunden, at denne har læst, forstået og accepteret denne Policy.

SVENSKA

Vår integritetspolicy för SMF-kunder ("Policy") är uteslutande upprättad på engelska och utgör den enda tillämpliga referenstexten avseende behandling av personuppgifter som rör SMF-kunder. Varje samarbete med DNX360 i egenskap av SMF-kund innebär ett fullständigt och villkorslöst godkännande av den gällande Policy, såsom den återges nedan.

Genom att samarbeta med DNX360 som SMF-kund bekräftar SMF-kunden att den har läst, förstått och accepterat denna Policy.

SLOVENČINA

Naša Privacy Policy for SMB Clients (d'alej len „Policy“) je vypracovaná výlučne v anglickom jazyku a predstavuje jediný rozhodujúci referenčný text upravujúci spracúvanie osobných údajov týkajúcich sa klientov z radov MSP. Akýkoľvek zmluvný alebo obchodný vzťah s DNX360 v postavení klienta z radov MSP znamená úplný a bezvýhradný súhlas s platnou Policy, ako je uvedená nižšie.

Nadviazaním spolupráce s DNX360 ako klient z radov MSP dotknutá osoba vyhlasuje, že si túto Policy prečítala, porozumela jej a akceptovala ju.

This Privacy Policy (the "Policy") explains how J. Sallinger Ltd. (company registration number 12797704), trading as DNX360 ("DNX360", "we", "us", or "our"), collects, uses, stores, shares, and protects personal data in connection with your use of the DNX360 platform (the "Platform") as a small or medium-sized business client (an "SMB Client", "you", or "your").

Your access to the Platform has been facilitated through a contractor, consultant, or service provider who maintains a direct contractual relationship with DNX360 (a "Contractor"). This Policy should be read in conjunction with our Terms of Service (SMB Client), our Acceptable Use Policy, and our Cookie Policy.

Please read this Policy carefully. By accessing or using the Platform, you acknowledge that you have read and understood this Policy and consent to the collection and processing of your personal data as described herein.

1. DATA CONTROLLER AND DATA PROCESSOR — DUAL ROLE

1.1 DNX360 operates in two distinct capacities in respect of your personal data:

1.1 DNX360 as Data Processor (Assessment Data)

1.1.1 In respect of Assessment data — including questionnaire responses, business diagnostic data, voice-transcribed responses, and related submissions made through the Platform — the Contractor is the data controller and DNX360 processes such data on behalf of the Contractor as data processor. DNX360 processes Assessment data in accordance with the Contractor's documented instructions and the data processing agreement between DNX360 and the Contractor.

1.1.2 If you wish to exercise any data subject rights (such as access, rectification, erasure, portability, or restriction) in respect of your Assessment data, you should contact the Contractor directly, as the Contractor is the data controller for such data. DNX360 will assist the Contractor in responding to such requests in accordance with applicable law.

1.2 DNX360 as Data Controller (Account, Technical, and Usage Data)

1.2.1 In respect of account data, technical data, usage data, and cookie data (as described in Clause 2 below), DNX360 acts as the independent data controller. This means DNX360 determines the purposes and means of processing such data and is directly responsible for compliance with applicable data protection laws in respect of that processing.

1.2.2 The data controller for the purposes of this Policy is:

J. Sallinger Ltd., trading as DNX360
 128 City Road
 London, EC1V 2NX
 United Kingdom
 Company Registration Number: 12797704
 Email: legal@dnx360.com

1.2.3 DNX360 has not appointed a Data Protection Officer. For all data protection enquiries, requests, or complaints, please contact us at legal@dnx360.com

2. PERSONAL DATA WE COLLECT

2.1 We collect and process the following categories of personal data:

2.1 Assessment and Questionnaire Data (Processed as Data Processor)

- (a) questionnaire responses, including free-text and structured answers to business diagnostic questions;
- (b) voice-transcribed responses (the Platform supports voice transcription in over fifty (50) languages);
- (c) business operational data submitted through the questionnaire, including information about processes, tools, workflows, team structures, business performance, and strategic priorities;
- (d) interview transcripts and supplementary documentation uploaded in connection with an Assessment; and
- (e) any other data submitted by you or your Stakeholders through the Assessment process.
- (f) any other personal data contained in materials, responses, attachments, recordings, or other content submitted by you or your Stakeholders through, or in connection with, the Assessment process.

2.2 Account and Registration Data (Processed as Data Controller)

- (a) full name, job title, and professional role;
- (b) business email address and business telephone number;
- (c) company or organisation name, address, and registration details; and
- (d) account identifiers, login credentials (stored in encrypted form), and authentication data.

(e) any other personal data provided by you or your organisation in connection with account creation, profile completion, account administration, or use of the Platform.

2.3 Technical Data (Processed as Data Controller)

- (a) internet protocol (IP) address;
- (b) browser type and version;
- (c) device type, operating system, and screen resolution;
- (d) device identifiers and unique device tokens; and
- (e) time zone setting and general geographic location (derived from IP address).
- (f) any other technical or online identifier information generated by, collected from, or associated with your access to and use of the Platform, devices, or systems.

2.4 Usage Data (Processed as Data Controller)

- (a) pages and features visited or used within the Platform;
- (b) session duration, timestamps, and frequency of access;
- (c) clickstream data and navigation paths;
- (d) referral source and entry/exit pages; and
- (e) error logs and performance data.
- (f) any other information relating to your interaction with, access to, and use of the Platform and its features, functionality, and services.

2.5 Cookie and Tracking Data (Processed as Data Controller)

2.5.1 We use cookies and similar tracking technologies to collect certain data automatically when you access the Platform. Please refer to our Cookie Policy for full details of the cookies we use, their purposes, and your choices regarding cookies.

3. PURPOSES AND LEGAL BASES FOR PROCESSING

3.1 Assessment Data (Processor Role)

3.1.1 DNX360 processes Assessment data solely on behalf of the Contractor and in accordance with the Contractor's instructions for the following purposes:

- (a) operation of the Questionnaire Engine, AI Engine, and diagnostic analysis systems;
- (b) generation of Outputs, including DNX360 Scores, Recommendations Reports, prioritisation matrices, and implementation roadmaps;
- (c) voice transcription processing;
- (d) customer support and troubleshooting related to Assessments; and
- (e) any other purpose reasonably necessary for the provision of the Platform and services.

3.1.2 The Contractor is responsible for establishing the legal basis for the processing of Assessment data. You should refer to the Contractor's own privacy notice for information about the legal basis on which your Assessment data is processed.

3.2 Controller Data (Account, Technical, Usage Data)

3.2.1 DNX360 processes controller data for the following purposes and on the following legal bases:

- (a) Provision of Platform access** (contract performance): to create and manage your account, authenticate your identity, and provide you with access to the Platform and its features;
- (b) Platform operation and security** (legitimate interests): to maintain, monitor, and improve the security, integrity, and performance of the Platform, to detect and prevent fraud, abuse, and unauthorised access, and to enforce these Terms;

- (c) **Analytics and platform improvement** (legitimate interests): to analyse usage patterns, understand how the Platform is used, identify areas for improvement, and develop new features and functionality;
- (d) **Communications** (legitimate interests / contract performance): to respond to your enquiries, provide technical support, and send you service-related notifications;
- (e) **Legal compliance** (legal obligation): to comply with applicable laws, regulations, court orders, and governmental requests; and
- (f) **Legal claims and dispute resolution** (legitimate interests): to establish, exercise, or defend legal claims and to protect DNX360's rights and interests.

4. ANONYMISED AND AGGREGATED DATA

4.1 DNX360 may create anonymised and aggregated datasets derived from Assessment data and usage data. Such datasets are processed so that they cannot reasonably be used to identify any individual, SMB Client, or Contractor.

4.2 DNX360 retains a perpetual, worldwide, royalty-free right to use, process, analyse, and exploit anonymised and aggregated data for any lawful purpose, including without limitation:

- (a) training, improving, and enhancing AI models, algorithms, and the Questionnaire Engine;
- (b) producing industry reports, benchmarking studies, and market analyses;
- (c) internal research, product development, and innovation;
- (d) commercial analytics, service optimisation, and security enhancement; and
- (e) any other legitimate business or research purpose.
- (f) carrying out any other lawful business, commercial, analytical, research, development, security, statistical, or product improvement activity using anonymised and aggregated data.

4.3 Anonymised and aggregated data does not constitute personal data and is not subject to the data protection rights described in this Policy.

5. DATA SHARING AND DISCLOSURE

5.1 DNX360 may share your personal data with the following categories of recipients:

- (a) **Contractor:** Assessment results, Outputs, and related data are shared with the Contractor who facilitated your access to the Platform, as the Contractor is the data controller for Assessment data;
- (b) **Sub-processors and service providers:** we engage third-party service providers who process personal data on our behalf, including cloud hosting and infrastructure providers, AI and machine learning service providers, analytics providers, email and communication service providers, customer support platforms, and payment processors. All sub-processors are bound by contractual obligations to process personal data only in accordance with our instructions and to maintain appropriate security measures;
- (c) **Professional advisors:** we may share personal data with our legal, accounting, insurance, and other professional advisors as reasonably necessary;
- (d) **Law enforcement, regulators, and courts:** we may disclose personal data where required by applicable law, regulation, legal process, or governmental request, or where we reasonably believe disclosure is necessary to protect our rights, safety, or property, or the rights, safety, or property of others;
- (e) **Corporate transactions:** in connection with any merger, acquisition, corporate reorganisation, sale of assets, financing, or similar transaction, your personal data may be transferred to the relevant third party as part of the transaction; and
- (f) **Affiliates:** we may share personal data with our corporate Affiliates for internal administrative purposes and to support the provision of the Platform.

5.2 DNX360 does not sell your personal data to third parties.

6. INTERNATIONAL DATA TRANSFERS

6.1 Your personal data may be transferred to, stored in, or processed in countries outside the United Kingdom, the European Economic Area ("EEA"), or your country of residence. Some of these countries may not provide the same level of data protection as your home jurisdiction.

6.2 Where we transfer personal data to a country that has not been deemed to provide an adequate level of data protection, we ensure that appropriate safeguards are in place, including:

- (a) the European Commission's standard contractual clauses (as amended or replaced from time to time);
- (b) the UK International Data Transfer Addendum or UK Addendum to the EU standard contractual clauses (as applicable);
- (c) an adequacy decision or finding by a competent data protection authority;
- (d) binding corporate rules approved by a competent supervisory authority; or
- (e) any other legally recognised transfer mechanism under applicable data protection law.

6.3 You may request further information about the safeguards we have put in place by contacting us at legal@dnx360.com.

7. DATA RETENTION

7.1 We retain personal data for no longer than is necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by applicable law.

7.1 Assessment Data (Processor Role)

7.1.1 Assessment data is retained in accordance with the Contractor's instructions and the data processing agreement between DNX360 and the Contractor. Upon termination or expiry of the Contractor's agreement, Assessment data is handled in accordance with the applicable data return and deletion provisions.

7.2 Controller Data

7.2.1 Account and registration data is retained for the duration of your access to the Platform and for a period of thirty-six (36) months following the termination or expiry of your access, or such longer period as is reasonably necessary for:

- (a) compliance with legal, regulatory, tax, and accounting obligations;
- (b) the establishment, exercise, or defence of legal claims;
- (c) fraud prevention and security;
- (d) backup, archival, and disaster recovery; and
- (e) audit and record-keeping purposes.
- (f) any other legitimate retention purpose that is reasonably necessary in connection with the operation of our business, the enforcement of our rights, compliance obligations, or the protection of the Platform, Services, and our systems.

7.2.2 Technical and usage data is retained in aggregated or anonymised form for analytics and platform improvement purposes and may be retained indefinitely in such form.

8. YOUR RIGHTS

8.1 Depending on your jurisdiction and the applicable data protection laws, you may have the following rights in respect of your personal data:

- (a) Right of access: the right to obtain confirmation of whether we process your personal data and to receive a copy of such data;
- (b) Right to rectification: the right to request correction of inaccurate or incomplete personal data;
- (c) Right to erasure: the right to request deletion of your personal data in certain circumstances;
- (d) Right to restriction: the right to request restriction of processing in certain circumstances;
- (e) Right to data portability: the right to receive your personal data in a structured, commonly used, and machine-readable format;
- (f) Right to object: the right to object to processing based on legitimate interests or for direct marketing purposes;
- (g) Rights related to automated decision-making: the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects; and
- (h) Right to withdraw consent: where processing is based on consent, the right to withdraw consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

8.2 To exercise any of the above rights in respect of data for which DNX360 is the data controller, please contact us at legal@dnx360.com. We will respond to your request within the timeframe required by applicable law (generally within one (1) month).

8.3 For data subject requests relating to Assessment data (for which the Contractor is the data controller), please contact the Contractor directly. DNX360 will assist the Contractor in fulfilling such requests as required by applicable law and the data processing agreement.

8.4 We may request reasonable verification of your identity before processing any data subject request. We reserve the right to charge a reasonable fee or refuse to act on a request where it is manifestly unfounded, excessive, or repetitive, as permitted by applicable law.

9. RIGHT TO COMPLAIN

9.1 If you are not satisfied with our response to your data protection enquiry or believe that we are processing your personal data in a manner that is not compliant with applicable data protection law, you have the right to lodge a complaint with a supervisory authority.

9.2 In the United Kingdom, the relevant supervisory authority is the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Website: <https://ico.org.uk>

9.3 If you are located in the European Economic Area, you may lodge a complaint with the data protection authority in your member state of residence, place of work, or place of the alleged infringement.

10. SECURITY

10.1 DNX360 implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures are designed taking into account the state of the art, the cost of implementation, the nature, scope, context, and purposes of processing, and the risks to the rights and freedoms of data subjects.

10.2 While we take reasonable steps to protect your personal data, no method of transmission over the internet or method of electronic storage is completely secure. We cannot guarantee absolute security of your personal data.

11. CHILDREN

11.1 The Platform is not directed at, and is not intended for use by, children under the age of eighteen (18) (or such higher age as may be applicable in your jurisdiction). We do not knowingly collect personal data from children. If we become aware that personal data has been collected from a child without appropriate parental consent, we will take steps to delete such data promptly.

12. CHANGES TO THIS POLICY

12.1 DNX360 reserves the right to update, modify, or replace this Policy at any time at its sole discretion. Updated versions will be posted on the Platform with a revised effective date.

12.2 Your continued access to or use of the Platform following the posting of any changes to this Policy constitutes your acceptance of such changes. We encourage you to review this Policy periodically.

12.3 Where changes are material, we will use reasonable efforts to notify you by email, in-Platform notification, or other appropriate means prior to the changes taking effect.

13. CONTACT US

13.1 If you have any questions, concerns, or requests regarding this Policy or our data processing practices, please contact us at:

J. Sallinger Ltd. trading as DNX360

128 City Road

London, EC1V 2NX

United Kingdom

Email: legal@dnx360.com

Websites: www.DNX360.com | www.DNX360.ai | www.DNX360.io

END OF PRIVACY POLICY (SMB CLIENT)