

# Reachal Privacy Shield Privacy Policy

## 1. Introduction

Reachal Ltd. ("Reachal" or "Company") has created this policy to demonstrate how we process and handle data that is collected in the European Economic Area (EEA) and transferred to the United States.

Reachal complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union to the United States.

Reachal has subscribed to and will adhere to the EU-U.S. and Privacy Shield Framework by adopting and implementing the Privacy Shield Principles ("Principles"). More information about the Privacy Shield can be found at [www.privacyshield.gov](http://www.privacyshield.gov). Our Privacy Shield certification can be found at [www.privacyshield.gov/list](http://www.privacyshield.gov/list).

## 2. Scope of this Policy

This Policy sets forth the privacy principles that Reachal follows when processing Personal Data for both non-HR and HR activities. Some types of Personal Data may be subject to other privacy-related requirements and policies. For example:

- Website –has its own [Privacy Notice](#).
- Client data – Personal Data associated with and/or received from a client is also subject to any specific agreement with, or a particular notice to, the client.
- Employees – Personal Data from employees is subject to internal human resource policies including the Privacy Notice for Employees.

## 3. Definitions

"Data Subject" means the individual to whom any given Personal Data covered by this Privacy Shield Policy refers.

"Personal Data" means any information relating to an individual residing in the European Union that can be used to identify that individual either on its own or in combination with other readily available data.



“Sensitive Personal Data” means Personal Data regarding an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, or sexual life.

## 4. Processing of EEA Personal Data

Reachal may process certain EEA personal data about current or prospective customers, business partners, suppliers, vendors, independent contractors, consumers, including information recorded on various media as well as electronic data. Reachal will process these data in conformity with the EU-U.S. Privacy Shield Principles and will continue to apply the Principles to personal data received under the application of the Privacy Shield.

Reachal may also share Personal Data with its service providers and suppliers (also known as “Agents”) for the sole purpose and only to the extent needed to support the customers’ business needs. Service providers and suppliers are required to keep confidential Personal Data received from Reachal and may not use it for any purpose other than originally intended.

Reachal also collects Personal Data concerning its employees for Human Resources purposes in connection with administration of its Human Resources processes and the purpose of communicating with its employees. Reachal also applies the EU-U.S. Privacy Shield Principles to this type of data.

## 5. Privacy Shield Principles

### 5.1. Notice

Reachal provides information on how it handles Personal Data in its Privacy Notices, which are issued to users of the website, employees and clients for specific contracts. These privacy notices, in addition to this Policy, demonstrate our privacy practices with respect to Personal Data received from the EEA in reliance on the Privacy Shield.

### 5.2. Choice

Reachal will provide individuals the opportunity to choose if their Personal Data is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals.

If Personal Data covered by this Policy is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorised or is to be disclosed to a non-agent third party, Reachal will issue Data Subjects with the decision whether to have their Personal Data used or disclosed. Where such use or transfer involves sensitive information, individuals must opt-in before such use or transfer.



### 5.3. Accountability for onward transfer

Reachal may transfer Personal Data for the purposes described in our Privacy Notices to a third party acting as a data controller or as an agent. If we intend on acting on this, all data will be protected in accordance to the Privacy Shield Principles.

The company is responsible for the processing of Personal Data received under the Privacy Shield and any data which is transferred and processed by the third party agent. If the Company becomes aware that an Agent is using or disclosing Personal Data in a fashion contrary to this Policy and/or the level of protection as required by the EU-U.S. Privacy Shield Principles, we will take reasonable and appropriate steps to prevent, remediate or stop the use or disclosure.

### 5.4. Security

Reachal is fully aware of the necessity to assess the risks involved in the processing of data, such as taking suitable precautions to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

### 5.5. Data integrity & purpose limitation

Reachal takes reasonable steps to limit the collection and usage of Personal Data to that which is relevant for the purposes for which it was collected, and to ensure that such Personal Data is reliable, accurate, complete and current.

Any Personal Data we retain is in line with our Privacy Notices and listed retention periods, unless there is an agreed extension to the retention period or permitted by law or by the Privacy Shield Principles. We will adhere to the Principles for as long as we retain the Personal Data collected under the Privacy Shield.

### 5.6. Access

Data Subjects whose Personal Data is covered by this Privacy Shield Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the Privacy Shield Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). Data Subject Access Requests of this nature should be sent to:

[dataprotection@reachal.com](mailto:dataprotection@reachal.com).

### 5.7. Recourse, enforcement & liability

In compliance with the Privacy Shield Principles, Reachal commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Reachal using the email address [dataprotection@reachal.com](mailto:dataprotection@reachal.com). Reachal commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by with regard to data transferred from the EU.



Individuals have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For more information, visit the Privacy Shield website using this link - <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

When necessary, we are required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

The Federal Trade Commission has jurisdiction over Reachal's compliance with the Privacy Shield.

## 6. Changes to the Privacy Shield Privacy Policy

This Policy may be amended from time to time, consistent with the requirements of the EU-U.S. Privacy Shield principles. Appropriate public notice will be given concerning such amendments.

## 7. Contact Information

If you have any questions, concerns or complaint regarding our privacy practices, or if you'd like to exercise your choices or rights, contact us using the details below:

Data Protection Officer - [dataprotection@reachal.com](mailto:dataprotection@reachal.com).

