



DIALIGHT ARTICLE 30 STATEMENT

1. Introduction:

This Record of Processing Activities (“**Record**”) describes how **Dialight Europe Limited** (“**Dialight**”) process personal data. Dialight recognizes that Article 30 of the EU General Data Protection Regulation (“**GDPR**”) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but Dialight will provide it to the appropriate supervisory authority on request as required by Article 30.

2. Data Controller Details:

Dialight plc

Address: Leaf C, Level 36, Tower 42, 25 Old Broad Street, London EC2N 1HQ

Website: www.dialight.com

Data Protection Officer: Jonathan Keen

3. Categories of Data Subjects:

Dialight collects personal data from the following categories of data subjects:

- Dialight customers or consumers.
- Dialight employees and job applicants.

4. Categories of Personal Data:

Dialight collects the following categories of personal data about customers:

- Personal details including name and contact information.
- Location details.
- Electronic identification data including IP address and information collected through cookies.
- Financial details.
- Credit card information and payment details.
- Contractual details including the goods and services provided.

Dialight collects the following categories of personal data about employees and job applicants:

- Personal details including name and contact information.
- Date of birth.
- Marital status.
- Beneficiary and emergency contact information.
- Government identification numbers.



- Education and training details.
- Bank account details and payroll information.
- Wage and benefit information.
- Performance information.
- Employment details.

Dialight collects the following categories of personal data about vendors or suppliers:

- Name and contact information.
- Financial and payment details.
- Purposes of Data Processing

5. Basis for data collection and processing:

Dialight collects and processes personal data about customers for the following purposes:

- Maintaining and enhancing Dialight's products and services.
- Providing products and services and customer management.
- Account management.
- Direct marketing.
- Supporting network and system security.
- Auditing.
- Complying with legal obligations.

Dialight collects and processes personal data about employees and job applicants for the following purposes:

- Recruitment and selection of employees.
- Personnel management.
- Human resources administration including payroll and benefits.
- Complying with legal obligations

Dialight collects and processes personal data about vendors or suppliers for the following purposes:

- To obtain products and services.
- Vendor administration, order management, and accounts payable.
- Evaluating potential suppliers.



6. Categories of Personal Data Recipients:

Dialight discloses personal data to the following categories of recipients, some of which may be located in third countries or may be international organizations as defined in Article 4(26) of the GDPR:

- Dialight's parent company, subsidiaries, and affiliated entities, including branches.
- Auditors and professional advisors, such as lawyers and consultants.
- Federal, state, and local law enforcement officials.
- Third-party service providers, such as providers of:
 - IT system management;
 - information security;
 - human resources management;
 - payroll administration; or
 - retirement plan administration.

Dialight transfers personal data to its affiliates the following third countries:

- USA, Mexico, Brazil, Singapore, Malaysia, Australia.

All Dialight entities in third countries have signed the Dialight intra-group transfer agreement, which incorporates the EU Model Clauses to ensure the safeguarding of personal

7. Personal Data Retention Periods:

Except as otherwise permitted or required by applicable law or regulation, Dialight only retains personal data for as long as necessary to fulfil the purposes Dialight has collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, Dialight considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

Dialight typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

- Information about customers:
 - Personal details including name and contact information: for as long as they are an active customer of Dialight plus four years.
 - User activity details and user preferences: for as long as they are an active customer of Dialight plus four years.
 - Location details: for as long as they are an active customer of Dialight plus four years.



- Electronic identification data including IP address and information collected through cookies: for as long as they are an active customer of Dialight plus four years.
- Contractual details including the goods and services provided: for as long as they are an active customer of Dialight plus four years.
- Information about employees and job applicants:
- Personal details including name and contact information: for the duration of time they are an active supplier for Dialight plus four years.
- date of birth: 6 years post leave date.
- marital status: 6 years post leave date.
- beneficiary and emergency contact information: 6 years post leave date.
- government identification numbers: 6 years post leave date.
- education and training details: 6 years post leave date.
- bank account details and payroll information: duration of employment.
- wage and benefit information: 6 years post leave date.
- performance information: duration of employment.
- employment details/contract of employment: 6 years post leave date.

8. Technical and Organizational Security Measures:

Dialight has implemented the following technical and organizational security measures to protect personal data

- Segregation of personal data into regional networks.
- Access control and user authentication.
- Employee training on information security.
- Written information security policies and procedures.

9. Changes to this Record of Processing Activities:

Dialight reserves the right to amend this Record of Processing Activities from time to time consistent with the GDPR and other applicable data protection requirements.



Record of Processing Activities for Dialight group companies

Dialight Corporation (United States)

This Record of Processing Activities (Record) describes how Dialight Corporation processes personal data. Dialight Corporation recognizes that Article 30 of the EU General Data Protection Regulation (GDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but Dialight will provide it to the appropriate supervisory authority on request as required by Article 30.

- Data Processor Details:
- Name: Dialight Corporation
- Address: 1501 Route 34 South, Farmingdale, New Jersey 07727, USA
- Telephone Number: +1 732.751.5856
- Website: www.dialight.com
- Data Controller: Dialight Europe Limited, Dialight A/S, Dialight GmbH, Dialight plc

Categories of Processing

- Data Processor processes personal data on behalf of Dialight Europe Limited, Dialight A/S, Dialight GmbH and Dialight plc for the following purpose(s):
- Product development.
- Information security.
- Human resources management.
- Payroll administration.
- Retirement plan administration.

Technical and Organizational Security Measures

Data Processor has implemented the following technical and organizational security measures to protect personal data:

- Segregation of personal data from other networks.
- Access control and user authentication.
- Employee training on information security.
- Written information security policies and procedures.



Dialight A/S (Denmark)

This Record of Processing Activities (Record) describes how Dialight Corporation processes personal data. Dialight Corporation recognizes that Article 30 of the EU General Data Protection Regulation (GDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but Dialight will provide it to the appropriate supervisory authority on request as required by Article 30.

- Data Processor Details:
- Name: Dialight A/S
- Address: Ejby Industrivej 91 B, 2600 Glostrup, Copenhagen, Denmark
- Telephone Number: +45 8877 4400 (O)
- Website: www.dialight.com
- Data Controller: Dialight Europe Limited, Dialight GmbH, Dialight plc

Categories of Processing

- Data Processor processes personal data on behalf of Dialight Europe Limited, Dialight GmbH and Dialight plc for the following purpose(s):
- Product development.
- Information security.
- Human resources management.
- Payroll administration.
- Retirement plan administration.

Technical and Organizational Security Measures

Data Processor has implemented the following technical and organizational security measures to protect personal data:

- Segregation of personal data from other networks.
- Access control and user authentication.
- Employee training on information security.
- Written information security policies and procedures.



Dialight plc (United Kingdom)

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- Data Processor Details:
- Name: Dialight plc
- Address: Leaf C, Level 36, Tower 42, 25 Old Broad Street, London EC2N 1HQ
- Telephone Number: 0203 058 3534
- Website: www.dialight.com
- Data Controller: Dialight Europe Limited, Dialight A/S, Dialight GmbH

Categories of Processing

- Data Processor processes personal data on behalf of Dialight Europe Limited, Dialight A/S, Dialight GmbH for the following purpose(s):
- Product development.
- Information security.
- Human resources management.
- Payroll administration.
- Retirement plan administration.

Technical and Organizational Security Measures

Data Processor has implemented the following technical and organizational security measures to protect personal data:

- Segregation of personal data from other networks.
- Access control and user authentication.
- Employee training on information security.
- Written information security policies and procedures.



Dialight GmbH (Germany)

This Record of Processing Activities (Record) describes how Dialight Corporation processes personal data. Dialight Corporation recognizes that Article 30 of the EU General Data Protection Regulation (GDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but Dialight will provide it to the appropriate supervisory authority on request as required by Article 30.

- Data Processor Details:
- Name: Dialight GmbH
- Address (No physical German Office): Leaf C, Level 36, Tower 42, 25 Old Broad Street, London EC2N 1HQ
- Telephone Number: 0203 058 3534 Website: www.dialight.com
- Data Controller: Dialight Europe Limited, Dialight A/S, Dialight plc

Categories of Processing

- Data Processor processes personal data on behalf of Dialight Europe Limited, Dialight A/S, Dialight plc for the following purpose(s):
- Product development.
- Information security.
- Human resources management.
- Payroll administration.
- Retirement plan administration.

Technical and Organizational Security Measures

Data Processor has implemented the following technical and organizational security measures to protect personal data:

- Segregation of personal data from other networks.
- Access control and user authentication.
- Employee training on information security.
- Written information security policies and procedures.