

Last updated: Jan 2021

Dtxplatform Sarl , here referred to as **“DTXplatform”**, **”Company”**, **“we”**, etc., commits to the compliance with data protection laws and the following Privacy Policy states the practices that are used by us to collect personal data and the services we provide to Advertisers and Publishers (**“You”**, **“Your”** etc.), and shares practices for [www.DTXplatform.com](http://www.DTXplatform.com) (the/our **“Website”**, **“the Platform”**).

## What is personal data?

In this Privacy Policy, “personal data” means any information relating to you as an identified or identifiable natural person (“data subject”); 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 online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

For the avoidance of doubt, personal data does not include data from which you cannot be identified (which is referred to simply as data, non-personal data, anonymous data, or de-identified data).

In this Privacy Policy, “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

# How do we collect personal data and for what purposes?

DTXplatform collects the personal data on the moment the customer sign-ups in the Website, with the customer's consent. Subsequently, you may enter into an agreement or contract with DTXplatform, and where this is the case, personal data will be processed only as is necessary for the performance of that agreement or contract or in order to take steps at your request prior to entering into that contract or agreement. By submitting your information to us, you agree to the processing set out in this Privacy Policy. After that, your personal data is stored while your partnership with DTXplatform is ongoing and once said the relationship is terminated for whatever cause, unless you oppose to it. Once the relationship is terminated, your personal data will be processed solely to the effects of demonstrating compliance with the legal obligations of the Company or only as is necessary for the purposes of any legitimate interests pursued by DTXplatform or by a third party (and in the latter case, only to such extent as those legitimate interests are not overridden by your interests or fundamental rights and freedoms). As a data subject, you have rights under applicable legislation to access, change/rectify, request deletion or restriction, object of processing, or requesting to receive or for us to transfer (port) your personal data free of costs at any time, according to the law in force. Further information on these rights is included within this Privacy Policy.

DTXplatform collects and processes personal data needed for the provision of products & services. We may collect and process the following data about you, depending on your relationship with DTXplatform :

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details (where applicable).
- **Transaction Data** includes details about payments to and from you and other details of products/services/transactions you have purchased or obtained from us or from one of our business partners.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website. This data also includes information about how you use our website, products and services, and navigate through the website, and may not necessarily comprise personal data. It may for example include information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, any phone number used to call our customer service number, and other information. More information on this is contained in our Cookies Policy available at <https://dtxplatform.com/cookies-policy/>
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

With the exception of Technical Data and certain Transaction Data, most of the personal data collected is the information you give us by filling in forms on our Website or by corresponding with us by phone, e-mail or otherwise.

We may also collect personal data about you from information we receive from other sources. This may occur if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We

may notify you when we receive information about you from them and the purposes for which we intend to use that information.

**If you fail to provide personal data:** Where we need to collect 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, and we may not be able to provide our services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## How we use your personal data

### When visiting our website

We may collect and process personal data about your use of our website. This data may include Technical Data as described above.

This data may be processed in order to deliver the content of our website correctly, to optimize the content of our website to ensure the long-term viability of our information technology systems and website technology, and to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

We also collect, use and share 'Aggregated Data' such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law provided it has been de-identified and anonymised. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data

as personal data; such data will be processed in accordance with this Privacy Policy.

The legal basis for this processing is our legitimate business interests, namely monitoring and improving our website and the proper protection of our business against risks and your consent when agreeing to accept cookies.

Personal Data will be stored in accordance with the time limits of such cookies and how they are set to expire and will be deleted automatically afterwards (normally no more than one year), or de-identified for statistical purposes, and in this latter case shall be kept indefinitely.

In certain cases, some of the above data is collected using cookies, and includes data from which you cannot be identified. Such data will be retained in accordance with our Cookies Policy, which can be accessed via the link at the beginning of this Privacy Policy.

## **KYC and AML/CFT checks**

We and other organizations may also access and use your personal data to conduct 'know your client' ("**KYC**") checks, credit checks and checks to prevent fraud, money laundering and terrorist financing ("**AML/CFT**"). If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to the relevant authorities including credit reference agencies and fraud prevention agencies. We will also record this. Law enforcement agencies may access and use this information. We, and other organizations that may access and use information recorded by such agencies, may do so from other countries.

## **Other uses of your personal data**

We may process any of your personal data where it is necessary to establish, exercise, or defend legal claims. the legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Further, we may process your personal data where such processing is necessary in order for us to comply with a legal obligation to which we are subject

Contact data can be used for communication purposes, including but not limited to email messaging (system email, marketing email, etc.)

## **Confidentiality and Security**

DTXplatform commits to taking all the necessary measures to prevent and secure the data that's collected and treated, preventing them from being damaged, destroyed or even stolen. However, we don't control every risk associated with internet usage, so there're always risks associated with the usage of internet and data sharing online.

No data transmission over the Internet or website can be guaranteed to be secure from intrusion; any transmission is at your own risk. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential and for complying

with any other security procedures that we notify you of. We ask you not to share a password with anyone.

## **Third parties access**

Your data may be transferred to third parties for compliance with legal obligations to which the Company is subject based on its activity, or as may be required in order to provide the services that those third parties were hired for. Providers with whom DTXplatform has subscribed will need to enter into confidentiality and data processing agreements that are necessary and mandatory under any applicable privacy legislation. We may permit selected third parties such as business partners, suppliers, service providers, agents and contractors who will be subject to obligations to process such information in compliance with the same safeguards that we deploy, to use your personal information.

We may also use third party applications and software for the purposes of creation and maintenance of mailing lists, webform collection, and transmission of social media links. We are not responsible for the privacy practices and policies of such third party service providers and you are strongly encouraged to review such policies in order to ensure you agree to the processing of your personal data by third parties in the manner described therein. We will however, to such extent as reasonably possible, ensure that third parties we use keep your information secure and agree not to use it for their own direct marketing purposes.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your Personal Data in order to comply with any legal

obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

Finally, as described in the previous section, relevant authorities including credit reference agencies and fraud prevention agencies may be given access to your personal data in connection with our relevant KYC and AML/CFT obligations.

## **Export outside the EEA**

Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the EEA.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. If we decide that, staff or suppliers in those countries which have not had these approvals, will have access to your personal information, we will either ask for your consent to the transfer or transfer it subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.

The EEA includes all the EU Members States plus Norway, Iceland and Liechtenstein.

## **Existence of Automated Decision-making**

We do not use automatic decision-making or profiling when processing personal data. This means decisions are not made by robots or computers, and therefore not 'automated'. However, certain third parties may use certain automated decision-making tools or software. We are not responsible for the privacy practices of others and will take reasonable steps to bring such automated decision-making to your attention, but you are encouraged to become familiar with the privacy practices of any third parties you enter into any agreements with.

## **Storage limits and retention**

We will retain your personal information for as long as is necessary for the processing purpose(s) for which it was collected and any other permitted linked purpose (for example certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). So if information is used for two purposes we will retain it until the purpose with the latest period expires, but we will stop using it for the purpose with a shorter period one that period expires.

We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed.

## **Cookies**

Our Website uses cookies to distinguish you from other users of the Website. This helps us provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookies Policy available at <https://dtxplatform.com/cookies-policy/>.

## **Changes to our Privacy Policy**

We may change the content of our website or services without notice, and consequently our Privacy Policy (and/or Cookies Policy) may change at any time in the future. We, therefore, encourage you to review it from time to time to stay informed of how we are using personal information.

If we update or modify this Privacy Policy we will change the “Last Updated” date at the beginning of this Privacy Policy (the same applies to our Cookies Policy). Any amended policy will be effective immediately after the date it is posted. If you do not agree to the revised policy, you should discontinue your use of the Website. By continuing to access or use the Website after the effective date, you confirm your acceptance of the revised policy and all of the terms incorporated therein by reference.

Any social media channels connected to the Website and third party applications will be subject to the privacy and cookies policies and practices of the relevant platform providers which, unless otherwise indicated, are not affiliated or associated with us

## **Contacting us**

If you have questions or concerns regarding this statement, you should first contact us through email. You can address your general questions and comments by e-mail to [support@DTXplatform.com](mailto:support@DTXplatform.com).

This website is owned and operated by DTXplatform Limited; a company incorporated in Morocco (Company Registration Number 32753171 ) with its registered address at Zone industrielle my rachid lot 94.

## Your rights as a data subject

You have certain rights under applicable legislation, and in particular under the GDPR. We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

To exercise any of the below rights please contact us in the first instance on the above contact details.

Requests are free of charge, unless manifestly unfounded or excessive in which case we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

Requests will be processed within one month of receipt but this might be extended to two months in case of a complex request, where you have made a number of requests, or if the identity of the requestor cannot be verified. In such cases, we will notify you and keep you updated, and may seek additional information to allow us to understand your request.

Please note that the Company may be subject to legal and regulatory obligations which may limit or restrict the enforcement of your rights on some occasions.

### Right to information

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide such information. Of course, if you have any further questions you can contact us on the above details.

## **Right of access**

You have a right to obtain confirmation from us as to whether or not your personal data are being processed and, where this is the case, a right of access to your personal data. We have an obligation to provide additional information when complying with an access request, and we have endeavored to capture this information within this Privacy Policy.

We are happy to provide you with details of the personal data that we process about you. To protect our customers' personal information, we follow strict storage and disclosure procedures, which means that we will require proof of identity from you prior to disclosing such information. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## **Right to rectification**

You have the right to have any inaccurate personal data rectified and to have any incomplete personal information about you completed.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If we do hold personal data and you believe it is incorrect, you may submit a request to us to correct any alleged mistakes.

We shall communicate any rectification of personal data to each recipient to whom the personal data have been disclosed, unless this proves

impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

## **Right to erasure ('right to be forgotten')**

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected
- you withdraw your consent to consent based processing and no other legal justification for processing applies
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and/or
- erasure is required to comply with a legal obligation that applies to us.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

We shall communicate any erasure of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

## **Right to restrict processing**

Instead of requesting erasure, you also have the right to restrict processing of your personal information where:

- you contest the accuracy of the personal information;
- processing is unlawful, but you do not want us to erase it;
- we no longer need to process your personal information but you need us to retain your information as you need it for the establishment, exercise, or defence of legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

We shall communicate any restriction of personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort, and shall inform you about such recipients if you request it.

## **Right to object to processing**

You also have the right to object to processing of your personal information under certain circumstances, such as:

- where the processing is based on your consent and you withdraw that consent;
- 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; or
- where we are processing your personal data for direct marketing purposes

Exercise of this right may impact the services we can provide and we will explain this to you if you decide to exercise it. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms, and this may allow us to continue to (wholly or partly) process your personal information.

## **Right to data portability**

With respect to automated information which you initially provided consent for us to use, or where the processing is necessary for the performance of a contract to which you are party (or in order to take steps at your request prior to entering into a contract), you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

## **Right to object**

You have a right to object at any time to processing of personal data (including profiling) concerning you which is based on:

- the performance of a task carried out in the public interest or in the exercise of official authority vested in a controller; or
- the legitimate interests pursued by a controller.

We do not process personal data on grounds of public interest or exercise of official authority. We do however rely on our legitimate interests as a lawful basis for processing personal data as outlined in this Privacy Policy. This applies, in particular, in the context of directly marketing to you.

We will only send you marketing information where you have agreed to opt-in to receive it. You have a choice about whether or not you wish to receive direct marketing information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above); or
- you have otherwise given your prior consent.

We will only use your preferred communication channels to contact you, and on each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your

personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You can change your marketing preferences and/or opt-out at any time by contacting us on the above details.

Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

## **Right to freedom from automated decision-making**

As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

## **Other rights**

### **Right to withdraw consent**

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you

withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

## **Raising a complaint about how we have handled your personal data**

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

119 BD ABDELMOUMEN ETG2 N18 Casablanca Morocco

Morocco

**Email:** [support@DTXplatform.com](mailto:support@DTXplatform.com)

**Phone:** (+212) 771794031

**Phone:** (+1) **5046127083**

**Phone:** (+34) **604 16 31 66**

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.