



1 INTRODUCTION

At Enreach, we value your privacy and are committed to protecting your personal data ('Personal Data'). This privacy statement ('Privacy Statement') explains how we process your Personal Data in accordance with applicable data protection legislation ('Data Protection Legislation'), what Personal Data we process, for what purposes we process your Personal Data, how we protect your Personal Data, how long we store your Personal Data, how you can exercise your privacy rights in relation to this Personal Data, and any other information that may be relevant to you as an account holder and user ('User') of the DialoX Platform Service ('DialoX').

In this Privacy Statement, 'you', 'your', and 'yours' refers to all data subjects ('Data Subject') interacting with DialoX as a User, whereas 'Enreach', 'we', 'our', or 'us' refers to Enreach Holding B.V., as the provider of DialoX. Additionally, you will see references to the Enreach Group, which includes all other Enreach entities globally. Further information on the Enreach Group can be obtained by contacting us using the [Contact Information](#) provided below.

Enreach is the independent data controller ('Independent Data Controller') for the Personal Data we process to enable you access to DialoX as well as to manage your account on the platform. We process this data for our own legitimate business purposes to provide you the best services ('Services') we can offer. For any Personal Data you or your customers (bot users) submit on the platform via your account, we operate in the role of a data processor ('Data Processor') as we process the data on your behalf, following your own purpose(s) for processing the data as a data controller ('Data Controller').

Without the processing of your Personal Data, you will not be able to access or use DialoX. By acknowledging this Policy, you are fully informed about how your Personal Data is processed by us when you use the platform.

This Privacy Statement is applicable to following domain:

studio.dialox.ai/login

We did our best to provide you with all the necessary information in a clear and readable format in this Privacy Statement. However, if you have any questions about our use of your Personal Data after reading this Privacy Statement, you can of course always contact us through the contact details provided below.

The capitalised words in this Privacy Statement have the meanings ascribed to them in this Privacy Statement and in the [Definitions](#) provided below.

2 CONTACT INFORMATION

You can contact us here:

Enreach B.V.



Address: Verlengde Duinvalleiweg 102, 1361 BR Almere, the Netherlands

Email: info@enreach.com

Phone: +31 088 889 0889

2.1. Data Protection Officer

We have a dedicated Data Protection Team and a Data Protection Officer ('DPO'). If you have any questions relating to the processing of your Personal Data or want to contact our DPO, feel free to do so using the details provided below:

Enreach Data Protection Team

Email: dataprotectionteam@enreach.com

Phone: +31 088 889 0889

3 DEFINITIONS

Below are some key terms relevant to this Privacy Statement:

Data Controller: Natural or legal entity that determines the purposes and means for the processing of Personal Data.

Data Processor: Natural or legal entity processing data on behalf of the Data Controller.

'Data Protection Legislation': Data Protection Legislation refers to the applicable laws that govern the protection of Personal Data and privacy. This includes the legislation applicable to the processing of Personal Data in the EU, such as the General Data Protection Regulation ('GDPR') and the ePrivacy Directive ('ePD'), as well as any national laws implemented in connection with the aforementioned legislation.

'Data Subject' (you): Natural person(s) whose Personal Data is processed, specifically in this case, you as the User.

Independent Data Controller: A natural or legal person which alone determines the purpose and means of the processing of the Personal Data, independently of the existences of another Data Controller.

Personal Data: Any information directly or indirectly relating to an identified or identifiable natural person, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Services: The access to and use of our applications, platform, features, interfaces, websites, content, products, and services related to the DialoX platform.



‘Sensitive Personal Data’: Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a Data Subject’s sex life or sexual orientation.

4 WHAT PERSONAL DATA WE PROCESS AND WHY

Personal Data obtained via the DialoX website, or the platform itself is used only in the ways described in this Privacy Statement or otherwise for the purpose(s) stated at the time that the data is collected. We make every effort to avoid any excessive or irrelevant collection of Personal Data.

When you or your customers submit data to the DialoX platform by using the Services, we only set the parameters which regulate the acceptable use of DialoX and the acceptable content that may be transmitted, stored and processed using the Services. We do not determine the purposes and means for the processing of Personal Data transmitted, stored, or processed by you or your customers on the platform. It is your responsibility to ensure that you and your customers only submit content that falls under the parameters set in the End-User Licence Agreement (EULA), as well as that you and your customers (bot users) only submit Personal Data insofar it is necessary to achieve the purpose(s) of using the Services.

4.1 How do we collect Personal Data

We may collect Personal Data directly from you or indirectly from your customers:

- **Directly from you as a User:** Personal Data may be directly collected from you when you register to DialoX or when you use the Services. If you choose not to provide Personal Data to us, you will not be able to use the platform.
- **Indirectly from your customers:** Personal Data may also be collected indirectly through your customers when they use the bot(s) you develop on the platform. When your customers (bot users) have submitted Personal Data on the platform, we operate under the assumption that you as the Data Controller have obtained the necessary valid legal basis to collect such data.

4.2 How do we process Personal Data and why?

4.2.1 On your behalf or on behalf of your customers

We do not control the purposes and means for the collection of your or your customers’ Personal Data when providing our Services on your behalf and are therefore not responsible for it. We only process the data to the extent necessary for providing the platform and for other technical purposes related to the availability, development, and usage of DialoX.

We only process your or your customers’ Personal Data when there is a legal basis for doing so. The Personal Data processed via DialoX is collected on the basis of the legal ground established by the you.



4.2.2 For our own legitimate business purposes

We also process your Personal Data for our own business purposes to enable you to create an account on and subsequently use DialoX. Enreach will be an independent Data Controller for such processing. The legal basis for this processing is our legitimate interest, which allows us to use your Personal Data in a manner that is necessary and proportionate to our legitimate business objectives. We ensure that such processing is conducted in compliance with the Data Protection Legislation. Enreach's legitimate business objectives consist of the following:

- Improving the core functionality of DialoX and customer experience;
- Answering to business queries;
- Quality control; and
- Providing developer and customer support.

4.3 What Personal Data do we process?

4.3.1 Your Personal Data

We may process the following categories of Personal Data when you create an account, log into or use your account:

- **Mandatory user information:** When you create an account on DialoX the required information needed to create your account consists of your username, email address and password.
- **Log-in information:** The collection of your Personal Data when logging into DialoX depends on your chosen method of logging in to the platform.
 - When you log in directly via DialoX your email address and password are requested. If you choose not to provide this Personal Data, you cannot access the platform.
 - When you log in through any of the third-party providers we enable on the platform, you submit your name, email address, account username, or password. We do not process or store any of the data you submit when logging in via these providers. You cannot access DialoX through a third-party provider if you do not hold an account with that provider.
- **Chat information:** When using the messaging functionality within DialoX, we will process the data necessary to facilitate communication. This data consists of IP address, login data, content of chat messages, chat partner, country, language, status of the chat messages, and any files you chose to transmit, including voice mails and voice transcriptions.

4.3.2 The data of your customers

When your customers (bot users) use the bot(s) you develop in DialoX we may process their name, email, phone number, country, language, chat contents, browser and IP address, as well as any files they chose to transmit, including voice mails and voice transcriptions. We may access this data to provide you with support if you request it. We do not determine the purpose and means for the processing of this data.

4.3.3 Sensitive Personal Data

Our intention is not to collect Sensitive Personal Data through DialoX. We therefore ask that you do not provide any type of Sensitive Personal Data. If you do wish to provide such Personal Data for any reason,



Enreach accepts your explicit consent to use that Personal Data in the ways described in this Privacy Statement.

You are solely responsible for informing your own employees who will use the platform as well as your customers (bot users) that any submission of Sensitive Personal Data constitutes explicit consent for processing such data through DialoX. It is your responsibility to communicate this clearly through your own privacy statements. Failure to include this information in your privacy statements may result in you being held accountable for any Data Protection Legislation non-compliance issues or liabilities.

4.3.4 Anonymous information

We may create anonymous, aggregated, or de-identified data from your Personal Data. We do this by excluding information that makes the data personally identifiable to you.

4.3.5 Necessary for our service provision

We may use third-party services, such as wholesalers, to facilitate the delivery of our Services. In such cases, we must share some necessary information with such wholesalers to provide certain services. When we share data with a wholesaler, the wholesaler must comply with our terms and conditions and adhere to the same privacy standards we have.

5 HOW DO WE STORE AND RETAIN YOUR PERSONAL DATA

We retain your Personal Data to provide high-quality service compliant with the Data Protection Legislation. Personal Data is stored as long as necessary to fulfil collection purposes, legal obligations, and reporting requirements. All data is stored on servers within the EEA.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure, and whether we can achieve the purposes through other means.

Personal Data may be anonymised in some circumstances rather than deleted. In this event, the anonymised data will no longer be traceable to you and is no longer considered Personal Data.

6 WITH WHOM WE MIGHT SHARE YOUR PERSONAL DATA

If we deem it necessary for the abovementioned processing purposes, your Personal Data may be shared with one or more third parties, regardless of whether the third party is affiliated with the Enreach Group, for the purpose of processing Personal Data in accordance with our instructions.



When third parties are given access to your Personal Data in line with the above, we undertake required contractual and organisational measures to ensure that your Personal Data are processed only to the extent that such processing is legitimate and necessary.

We may share your Personal Data with trusted third parties as follows:

6.1. Within the Enreach Group

The Enreach Group is composed of a wider group of undertakings with headquarters in the Netherlands, and entities located in the EU, the UK and Serbia. We may transfer your Personal Data to, or otherwise allow access to such data by other entities within the Enreach Group, which may use, transfer, and process your Personal Data for the purposes described within this Privacy Statement. We may also share aggregated data about our customers in the form of business intelligence and statistics with members of the Enreach Group.

6.2. With Data Processors

We may engage certain Data Processors who may process your Personal Data on our instructions. The Data Processors are contractually obliged to implement appropriate technical and organisational measures to ensure that your Personal Data is processed in accordance with our instructions. We may share your Personal Data with such Data Processors in relation to the hosting of your data, the functionality of DialoX, business intelligence analyses etc.

We only share your data with Data Processors that can provide sufficient guarantees that they will process your data securely and in accordance with the Data Protection Legislation. Our Data Processors cannot do anything with your Personal Data unless we have instructed them to do it. They will not share your Personal Data with any organisation apart from us or further sub-processors which must process your Personal Data on precisely the same terms and to the same high standards.

6.3. With regulators, authorities, and other relevant third parties

Where necessary for the processing purposes described above or where required by law, your Personal Data may be transferred to regulators, courts and other authorities, independent external advisors, and compliance and investigation teams.

7 HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA

We attach great importance to your privacy. We therefore implement suitable physical, electronic, and managerial procedures to safeguard and secure your collected Personal Data.

We have implemented generally accepted standards of technology and operational security in order to protect Personal Data from loss, misuse, alteration, or destruction. Only authorised Enreach personnel



are provided access to Personal Data and these employees are contractually or statutorily obliged to ensure confidentiality of this data.

We will implement appropriate technical and organisational measures to ensure that the processing of your Personal Data is performed in accordance with the Data Protection Legislation, in particular ensuring an appropriate level of security.

8 YOUR RIGHTS

Under the Data Protection Legislation, you have a number of rights regarding the processing of your Personal Data, as below:

8.1. Right to be informed about our collection and use of Personal Data

You have the right to be informed about the collection and use of your Personal Data. We ensure we uphold this right through this Privacy Statement.

8.2. Right of access

You have the right to access the information we process about you.

8.3. Right to rectification

You have the right to have incorrect or outdated information about yourself corrected.

8.4. Right to erasure (right to be forgotten)

In exceptional cases you have the right to have information about you deleted before the expiry of our retention period.

8.5. Right to restrict processing

In some cases, you have the right to have the processing of your Personal Data restricted. If you exercise this right, we may only process your Personal Data with your consent, or for the purpose of establishing, asserting, defending, protecting, a significant public or private interest, except when we process your data for storage.

8.6. Right to object

In certain cases, you have the right to object to our otherwise lawful processing of your Personal Data.

8.7. Right to transfer your information (data portability)

In certain cases, you have the right to receive your Personal Data in a structured, commonly used, and machine-readable format.

8.8. Right to withdraw your consent



You have the right to withdraw your consent at any time in the circumstances where you have given us consent to process your Personal Data.

8.9. Rights in relation to automated processing

An automated decision is one that is made by our systems rather than a person. You have the right to express your concerns and object to a decision taken by purely automated means under some laws such as the GDPR. You also have a right to request that a person review that decision.

This right is unlikely to apply to our use of your data, as any automated processing we carry out is unlikely to make decisions and would include human intervention. If you would like to discuss this in further detail, please contact us as set out above.

8.9. Right to lodge a complaint

You have the right to lodge a complaint with a competent supervisory authority.

You can invoke any of the above rights by reaching out to us on the [Contact Information](#) provided above. When you submit a request, we will ask you some additional questions to verify your identity. We will respond to your request as soon as possible, but at the latest within one month.

9 QUESTIONS OR COMPLAINTS

In case you have any questions with respect to the processing of your Personal Data as described within this Privacy Statement, you can contact the Enreach Data Protection Team and our DPO via the [Contact Information](#) above.

10 OTHER LINKS OR COMPLAINTS

Please be aware that when you access our website, it may link to other websites that you may access. We are not responsible for the data policies, content, or security of such sites. We do not have any control over any use of your data by third parties when you visit such sites or otherwise provide your data through these channels.

11 CHANGES

We reserve the right to modify or amend this Privacy Statement at any time. The effective date will be displayed below. It is the user's responsibility to check this document regularly for changes.

Thank you for taking the time to read our Privacy Statement.

Version 1.0; March 2025