

Global Privacy Policy

Effective date: January 1, 2025

Last revised: January 1, 2025

Aveer.hr, ("Aveer", "us", "we", or "our") operates the www.aveer.hr website (the "Site") and provides human resource management and related services (the "Services"), which is available through the Site.

This Privacy Policy informs you of how information about you is collected, used, and disclosed by us.

This Privacy Policy forms part of our Aveer Platform Terms of Service. Unless otherwise defined in this Privacy Policy, capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Service.

Scope of Application

This Privacy Policy applies to the following individuals :

- Visitors of the Site with whom Aveer does not have a contractual relationship
- Clients who use our Services, including client UBOs or representatives
- Independent Contractors who use our Services
- Aveer community platform users
- Suppliers who provide products or services to Aveer
- Candidates
- Prospects

- Participants of webinars, conferences, trade events, surveys, etc.

By using our Site and/or our Services as well as engaging with Aveer in any way, you agree to the collection and use of your information in accordance with this Privacy Policy.

Information Collection

Aveer collects and stores certain information about you. This information can be used on its own or in combination with other information to identify you ("Personal Information"). Below is a list of types of Personal Information that we may collect and use about you.

Categories of Personal Information	Description
Contact	Information we use to contact you including physical addresses, e-mail addresses, and phone numbers
Identification	Information we use to identify you including full name and DoB
Contractual	Information about the products or services we provide to you
Locational	Information we get from you in forms and contract information

Usage	Information about the usage of our Services and Site including metadata
Technical	Information on the devices and technology you use including IP address, login data, browser type and version, timezone, operating system, browser type
Communications	Information from communications between us including any personal data you may share with us in your messages, communication metadata
Professional	Information about professional jobs, based on information provided by employers and employees on the platform
Consents	Any permissions, consents or preferences that you give us
Other Information	Any other information you choose to provide to us through all available channels, participating in user/customer surveys or otherwise

	visiting and interacting with our Site and/or Services.
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For the avoidance of doubt, Personal Information shall not include any personal information which is anonymised, after which the identifiable data is destroyed. Aveer may also collect and use non-Personal Information to analyze the effectiveness of our Services and to improve our Services. We may collect non-Personal Information through the Services, the Site and through cookies.

Sources of Your Personal Information

We may collect Personal Information about you or your businesses from any of these sources:

- Directly for you when you use our Services, complete a contact form, request marketing communications, participate in surveys or contact us.
- Aveer collects profile and usage data when you interact with our Site and/or Services, including, without limitation, your security details, app or your web browser settings, marketing choices and data from the devices you use to connect to our platform so we can provide you with our products or services.
- We also collect information through the use of cookies and other internet tracking software while you are using our website or mobile apps as described in detail in our Cookie Policy.
- From third parties:
 - Companies, business partners or individuals that introduce you to us

- Business partners, service providers, sub-contractors, advertising networks, analytics providers, search information providers, fraud protection services, Payment Service Providers (PSPs) who help us authenticate your identity, improve the quality of our Services, promote our Services and protect our business. We may also receive Personal Information about you from providers that help prevent, detect and prosecute unlawful acts, money laundering, and fraudulent behavior.
- Social networks and other technology providers (for instance, when you click on one of our Facebook or Google adverts)
- Public information sources such as (without limitation) national company registries
- Market researchers
- Government, law enforcement agencies, authorities and regulatory bodies

Information Use

Below is a list of the ways that we may use your Personal Information together with the legal basis of processing, where applicable under data protection law.

Purposes for which we use your Personal Information	Legal basis	Individuals
Management of the contractual relationship	<ul style="list-style-type: none"> ● Performance of the contract 	<ul style="list-style-type: none"> ● Clients ● Independent

<p>with you to provide you with our Services</p>	<ul style="list-style-type: none"> • Compliance with our legal obligations 	<p>Contractors</p> <ul style="list-style-type: none"> • Suppliers
<p>Improving our business by</p> <ul style="list-style-type: none"> • Improving our services and operations • Developing new ways to meet our customers' needs and grow our business • Analyzing and studying how our customers use products and services from Deel 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest <p>Our legitimate interest is centered around enhancing the quality of our Services, optimizing operational efficiency, and maintaining a competitive edge in the market</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors • Deel community platform users • Suppliers • Prospects
<p>Secure access to our Services, including but not limited to performing</p>	<ul style="list-style-type: none"> • Performance of the contract 	<ul style="list-style-type: none"> • Clients • Independent

<p>the necessary identification and verification of our users prior to granting access to our Services</p>	<ul style="list-style-type: none"> ● Legitimate interest ● Consent <p>Our legitimate interest is to safeguard access to our Services to authorized only users who have gone through identification and verification processes</p>	<p>Contractors</p>
<p>Marketing and events-related communications, including but not limited to inviting you to participate in events, surveys, providing personalized content through advertising campaigns or otherwise communicating with you for marketing purposes to promote our Services</p>	<ul style="list-style-type: none"> ● Consent ● Legitimate interest <p>Our legitimate interest is to tailor our marketing communications to the preferences and interests of our audience and provide a personalized and engaging experience for our customers</p>	<ul style="list-style-type: none"> ● Visitors of the Site ● Clients ● Independent Contractors ● Deel community platform users ● Prospects ● Participants of webinars, conferences, trade events, surveys etc.
<p>Recruitment</p>	<ul style="list-style-type: none"> ● Performance of the contract 	<ul style="list-style-type: none"> ● Candidates

	<ul style="list-style-type: none"> ● Legitimate interest <p>Our legitimate interest is to assess candidates' qualifications and suitability for available positions and to maintain a pool of potential candidates for future opportunities</p>	
<p>Protect the security or integrity of us, our Site and our Services</p>	<ul style="list-style-type: none"> ● Legitimate interest <p>Our legitimate interest is to maintain the reliability and availability of our services by detecting and preventing security threats, fraud, money laundering and other crime, unauthorized access, risk and other activities that could harm our business, Site, or Services.</p>	<ul style="list-style-type: none"> ● Visitors of the Site ● Clients ● Independent Contractors ● Deel community platform users ● Suppliers ● Prospects ● Participants of webinars, conferences, trade events, surveys etc.

	<ul style="list-style-type: none"> • Legal Obligation • Performance of the contract 	
<p>Communicate with you about our Site and Services, such as to notify of changes and updates and to provide you with customer support and troubleshooting</p>	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interest <p>Our legitimate interest is grounded in our commitment to delivering a seamless and informative user experience and to provide assistance when needed</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors • Deel community platform users • Prospects
<p>To manage our business operations including but not limited to delivering Deel’s products and services, making and managing payments, managing fees and charges due on user accounts and debt</p>	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interests <p>Our legitimate interests to manage our business operations efficiently, deliver our products and</p>	<ul style="list-style-type: none"> • Clients • Independent Contractors • Suppliers

collection	services, and ensure the financial stability of our company	
Meet our legal, regulatory, and tax reporting obligations	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • Clients • Independent Contractors • Suppliers
To provide and maintain the Deel Community Platform	<ul style="list-style-type: none"> • Performance of the contract • Legitimate Interest <p>Our legitimate interest to ensure that the online platform operates smoothly and effectively to provide the services or features it offers to users</p>	<ul style="list-style-type: none"> • Deel community platform users
Aggregating pseudonymised personal data and reporting anonymised salary data for the purpose of compensation benchmarking in various	<ul style="list-style-type: none"> • Consent • Performance of a contract • Legitimate interest <p>Our legitimate interest in making informed</p>	<ul style="list-style-type: none"> • Workers

industries and geographies as well as for academic research purposes	decisions about compensation strategies, remain competitive, and attract and retain talent as well as benefiting society by advancing the knowledge in fields related to compensation, labor markets, and HR practice	
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In cases where we need to process personal data for the performance of the contract with you or as required by law and you refuse to provide your information, we may not be able to perform the contract with you and consequently, we may not be able to provide certain services to you.

Communications

We may contact you with newsletters and other marketing information that may be of interest to you. You may opt out of receiving any, or all, of these marketing communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us. Please note that we may still send you transactional or administrative messages related to the Service even after you have opted out of receiving marketing communications.

Information Sharing with Third Parties

We will only share your information with the third parties listed below for the purposes described above in the “Information Use” Section unless otherwise noted at the point of collection. We want to assure you that we do not sell or trade any personal information to third parties under any circumstances.

- Our clients to whom you provide your services
- Trusted third-party agents, partners, suppliers, and service providers who assist us in providing the Services to you and are only permitted to use your information according to the purposes specified in their agreement with us. These third parties include website hosts, data hosts, cloud software providers, IT providers, identification verification providers, customer support providers, payment processors, financial institutions, financial advisors, legal advisors, auditors, and insurance companies. These partners are required under law and contract to keep your Personal Information confidential
- Government or public agencies, law enforcement authorities, regulators or any other entity having appropriate legal authority for receipt of you Personal Information, if required or permitted by law or legal process or if we believe that such action is necessary to comply with the law, to protect the security or integrity of our business, our Site and/or Services and to protect the safety of the users of our Services or the public
- We may disclose your Personal Information to a third party who acquires any part of our business, whether such acquisition is by way of merger, consolidation, divestiture, spin-off, or purchase of all or a substantial portion of our assets
- We may share de-identified Personal Information with academic institutions to perform research, under controls that are designed to protect your privacy—including requiring such institutions to operate under confidentiality

agreements and mandating that published findings contain only de-identified and aggregated data

- From time to time, we may share reports with the public that contain anonymized, aggregate, de-identified information and statistics, and
- We may share Personal Information with our current and future Aveer affiliates. Our affiliates may use your Personal Information in a manner consistent with this Privacy Policy
- We may share Personal Information with third-party advertising partners such as social networks to perform marketing activities and to deliver targeted advertisements based on your interests
- When you provide your consent to us to share your information

Retention of Your Personal Information

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, consistent with applicable law. This retention period allows us to comply with our legal obligations, resolve disputes, enforce our agreements and study customer data as part of our own research. We will not retain your data for longer than is necessary to fulfill the purpose for which it is being processed.

To determine the appropriate retention period, we take into consideration the amount, nature, and sensitivity of the personal data, as well as the purposes for which we process it. We also assess whether we can achieve those purposes through other means. For the data retention period related to the Services provided to you, please refer to the Data Processing Addendum.

Security

The security of your Personal Information is important to us. We implement suitable measures to safeguard the information you entrust to us, preventing its loss, misuse, unauthorized access or disclosure, alteration, and destruction, addressing threats from both external and internal sources. Furthermore, we restrict access to your personal data to individuals such as employees, agents, contractors, and other third parties, but only those who require such access for legitimate business purposes. These authorized individuals will process your personal data solely based on our explicit instructions and are bound by a confidentiality obligation.

If you have selected a password or other login credentials that grant access to the Aweer platform, it is your responsibility to take all reasonable measures to maintain the confidentiality of this information. You should not share your password or login credentials with any other individual.

Please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you. Therefore, you are also a key stakeholder in making sure that your Personal Information is protected. If you become aware of any breach of security or privacy, please contact us immediately at aveer.calendar@gmail.com.

International Transfer

Information collected while you use the Site and/or Service, including your Personal Information, may be transferred to – and maintained on – computers located

outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we will transfer the information, including your Personal Information, to the United States and process it there. In order to provide adequate protection for the data transfer, we have in place contractual arrangements with our subsidiaries, affiliates and business partners in respect of such transfers. By utilizing our Sites and/or services, you authorize the international transfer of your data, to the United States, where we are based, and to other locations where we and/or our service providers operate. Note that the Aveer Platform is maintained and owned by Aveer.hr, a United States entity, however Aveer stores all Aveer Platform data in Ireland (EU) only.

Third-party Advertising, Links and Content

Our Site may contain links to other sites that are not operated by us. We allow third parties, including advertising networks, and other advertising service providers, to collect information about your online activities through cookies, pixels, local storage, and other technologies. These third parties may use this information to display advertisements on our Sites and elsewhere online tailored to your interests, preferences, and characteristics. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services. We strongly advise you to review the Privacy Policy of every site you visit.

Some third parties collect information about users of our Sites to provide interest-based advertising on our Sites and elsewhere, including across browsers and devices. These third parties may use the information they collect on our Sites to

make predictions about your interests in order to provide you with ads (from us and other companies) across the internet.

We may participate in similar programmes offered by other third parties to display relevant information and personalised advertisements via other channels. These may for example include programmes offered by other social media platforms, such as LinkedIn, X, TikTok, but also search engine platforms, such as Google. Please check the privacy policies of these third parties for more information.

We process this information only with your consent or when it aligns with our legitimate interest in tailoring our marketing communications to better reflect your preferences and interests. Our goal is to provide you with a personalized and engaging customer experience. You have the right to object to the use of your personal data for direct marketing purposes, including targeted advertising, at any time by following the steps in the "Your Rights" section. Also, to opt out of interest-based advertising across browsers and devices from companies that participate in the Digital Advertising Alliance or Network Advertising Initiative opt-out programs, please visit their respective websites.

Children's Privacy

We do not knowingly collect Personal Information from children under the age of 18. Our Site and Services are not addressed to minors. If you are a parent or guardian and you learn that your children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a child under the age of 18 without verifiable parental consent, we will take steps to remove that information from our servers.

Your Rights

Under applicable privacy regulation, you may have some or all of the following rights in respect of your Personal Information:

- to obtain a copy of your Personal Information together with information about how your Personal Information is processed;
- to rectify inaccurate Personal Information;
- to erase your Personal Information in limited circumstances where it is no longer necessary in relation to the purposes for which it was collected or processed;
- to restrict processing of your Personal Information
- to object to the processing of your Personal Information where we're relying on a legitimate interest;
- to object to decisions that are based solely on automated processing or profiling;
- to obtain a portable copy of your Personal Information, or to have a copy transferred to a third party controller; or
- to withdraw your consent, at any time, where you may have provided it for the collection, processing and transfer of your Personal Information for a specific purpose;

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection.

To exercise these rights you may contact us either by emailing aveer.calendar@gmail.com.

We may ask you for additional data to confirm your identity and for security purposes, before disclosing the information requested to you. If you would like to submit a request on behalf of another individual, you may do so by providing proof of authorization by the individual to submit such a request on their behalf. We reserve the right to charge a fee where permitted by law. We may also decline to process requests that jeopardize the privacy of others, are excessive, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we may need to retain certain Personal Information for a limited period of time for record-keeping, accounting and fraud prevention purposes. Please note also that you may be able to exercise some of these rights without our intervention. For example, if you are a registered Aveer platform user, you can access and update your personal data.

Changes To This Privacy Policy

This Privacy Policy is effective as of the “LAST REVISED” date specified at the top of this Privacy Policy and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

Questions or Concerns Regarding the Privacy Policy

If you have questions or concerns regarding privacy using our Service, please contact us at: aveer.calendar@gmail.com.