

## **DEXWAY – PRIVACY POLICY**

CAE is concerned about ensuring your privacy, treating it as a fundamental right which assists you and being reinforced in terms of security in its management and transparency in the processing of information with the entry into force of the new General Data Protection Regulation of in the European Union EU 2016/679 (hereinafter, GDPR), we provide hereunder the more relevant information related to the processing of personal data, data controllers, purposes, transfer and rights among other aspects.

### **Scope of this policy**

The following information on our privacy policy applies in general to the CAE website. However, certain applications, and services may have specific privacy policies.

Our website may contain links to third-party websites (external links). These websites are the responsibility of their respective owners and the privacy policy described where appropriate. If you find that any link on our web site refers to content that violates the legislation in force, please report this to the e-mail address [calidad@cae.net](mailto:calidad@cae.net). We will proceed to check and delete them promptly from our website.

### **Who is the data controller responsible for processing your personal data?**

CAE Computer Aided USA Corp., 1395 Brickell Ave, Suite 800 - Miami, FL 33131, USA or [calidad@cae.net](mailto:calidad@cae.net).

Main website: [www.cae.net](http://www.cae.net)

[www.dexway.com](http://www.dexway.com)

[www.voluxion.com](http://www.voluxion.com)

### **How does the data controller obtain my personal data?**

CAE has obtained the personal data being processed through various channels:

- Voluntary on your part at the moment of formalizing the business relationship either physically or via a web form.
- Public records and/or sources available to the public, if necessary, and provided that there is a legitimate interest to do so, and only in cases of contracting.

In the case of providing information about other people, you must also make sure that the information you provide is current, accurate, relevant, reliable and understandable, therefore, before initially reporting those data to CAE, you must inform such persons of the existence of this privacy policy and obtain their consent with regard to specially protected data.

If you provide us other individual's data, you are confirming that you have their permission.

### **What is the purpose of your data processed?**

If you are a customer, your personal data shall be processed for the purposes described or being compatible therewith and which are listed below:

- Formalisation and management of the contracted training project.
- Keeping you informed about promotions and improvements on the product purchased or on other products and services we believe related to that contracted and therefore, of interest to you.
- Implementation of information surveys and service quality programmes at different times.
- For the proactive management of information security, so that all of your data available over the internet comply with the principles of the General Data Protection Regulation.
- To guarantee the effectiveness of the compliance and the protection of the rights of information and privacy as outlined in articles 15 to 22 of the GDPR as well as for the exercise or defence of any kind of complaints or claims that may arise from the relationship maintained
- To send you commercial and/or promotional advertising information about products, through any means, including electronic media (in particular SMS or email).
- For the exercise or defence of claims of any kind that may arise from the relationship maintained.

### **What are considered commercial communications and of interest?**

Among the purposes, the following are included as being of legitimate interest if you are a customer or implied in your consent upon accepting this policy if you are not, but obtaining your data from forms, we shall process your basic data to keep you informed and always with clear option of being able to unsubscribe whenever you like:

- About CAE products and services.

### **In reference to the increasing use of Social Networks**

Our websites and applications may include plug-ins for social networks that are marked with a logo. If you access one of our sites or applications that contain them, these plug-ins can generate a link with the social network and may transmit data. Plug-ins, your browser, and the social network will then communicate information between each other.

Due to the built-in plug-ins, social networks shall display information that you have accessed a page specifically on our web site. If you are logged into the social network at that time, the visit can be attributed to your social network account. If you interact with plug-ins, for example, by clicking on the “like” button or making a comment, this information is transmitted directly to the social network and stored there in accordance with the guidelines of the relevant social network.

For more information about the purpose and the scope of the collection of these data and further processing and use by the social network, as well as your rights in this regard and the available settings to protect your privacy, check the data privacy information available on the social network in question.

If you do not want the social networks to collect data about you through our web site, you must log out of all social networks before visiting our website.

### **How long do we keep your data?**

Under the legal relationship as a result of the contract, personal data shall be kept entirely for the term of the contractual relationship or length of the service.

After completion of the contract, they shall be retained to meet potential liabilities or claims that may arise from the relationship, this is, at least, until expiry of the legal terms established by the Law on prevention of money laundering (where applicable), as well as any other which may apply.

### **What major vendors are our data transferred or reported to?**

CAE transfers data to consultants with the aim of maintaining the relevant, accounting and/or billing relationship.

### **Processing security and non-disclosure**

Our staff is well-informed about the legal requirements relating to data protection and privacy, and is committed to maintaining the confidentiality of the data processed in accordance with the provisions of the GDPR. Only those whose work involves serving customers and potential customers, as well as requests, applications and management policies, have access to personal data.

Your data shall be processed confidentially in accordance with the purposes and object of the contract even after termination thereof, both by CAE as well as by third party partners or suppliers for the management of the contracted service.

CAE complies with the security measures for the processing of personal data stipulated in the former regulation, RD 1720/2007, in force until last May 25 of this year, as well as the provisions of GDPR in article 32, while in the design of its technical and organisational measures it accounts without limitation for all guidelines in good

practices in the area of privacy published by the Spanish Data Protection Data Agency or works published by the Working Groups of article 29 (GT-29).

## **Email**

Email is one of the main channels of transmission of personal information but also the main channel through which malicious third parties can attack, therefore we provide a special section in our privacy policy:

- CAE uses the email address that has been provided to send a reply with the requested details. However, we shall only send personal or confidential information once it has been encrypted or, if this is not possible, by postal mail. If the content of your message is related to a contract, CAE shall archive the e-mail. The email address is used only to communicate with you and shall not be forwarded to third parties without your permission.
- If you receive an unsolicited email and you are not aware of having provided your data, we kindly ask you to report this to us to investigate, and where appropriate, to delete it; do not follow links that are suspicious or at least open them from the browser and not directly from the email.
- Before sending CAE an email that has not been encrypted or whose information is not protected, don't forget that the content is not protected against others who see or use them fraudulently. Only send the information with especially protected data when necessary.

If for any reason you detect that we have sent you an email which is not addressed to you, please delete it immediately and inform us ([calidad@cae.net](mailto:calidad@cae.net)) so we can investigate what happened and improve the security for us all.

Accordingly, we recommend that you send any message to CAE using the contact forms available.

## **Why are we entitled to process your data?**

The legal basis for the processing of your data is provided on the following grounds:

- For the formalisation, implementation and management of the contracted service.
- Your express consent if you are not a customer and you have requested commercial communications about other products and services that fit your profile.

### **What information rights do you have in regards to your privacy?**

The interested party in relation to the data processed by CAE may exercise free of charge, except in the event of unjustified recurrence, the following rights:

1. Access your personal data.
2. Amend your personal data if they are inaccurate or incomplete
3. Delete personal data when no longer needed for the purposes for which collected, or when disproportionate for that purpose.
4. Restrict the processing by CAE of part or all of your personal data in the cases legally established.
5. Oppose certain processing whose legal basis is the consent such as sending advertising or profiling, among other reasons.
6. Request the portability of your identifying personal data in an interoperable format, either for you or for those specified subject to compliance with due requirements.
7. At any time withdraw consent previously granted.

In accordance with the current regulations, the interested party may exercise their rights by requesting it in writing, and, together with a photocopy of an authentic document proving their identity (valid identity card, passport, driving licence or residence card) sending this to the following postal address: CAE Computer Aided USA Corp., 1395 Brickell Ave, Suite 800 - Miami, FL 33131, USA or [calidad@cae.net](mailto:calidad@cae.net).

Similarly, where not satisfied in the exercise of your rights, you may file a claim before the Spanish Data Protection Agency, control authority in the field of data protection, at the following address: C/ Jorge Juan, 6, 28001 Madrid.

If you have reached this privacy policy through any of the on-line you ACKNOWLEDGE that, by ticking the relevant box, you agree to all these conditions, and if otherwise we are pleased to have been able tell you about privacy management at CAE.