



GDPR

1. Background

This Document provides an overview of how “Kaleyra S.p.A” (an entity incorporated under the laws of Italy, together with its subsidiaries, affiliates (collectively hereinafter referred to as “Kaleyra”), is in compliance with the EU General Data Protection Regulation (“GDPR”) came into force on 25 May 2018. In this policy, “we”, “us” and “our” refer to Kaleyra S.p.A or its subsidiaries or affiliates.

2. Introduction

The EU General Data Protection Regulation (“GDPR”) came into force on 25 May 2018.

The new Regulation aims to standardise data protection laws and processing across the EU, giving people greater rights to access and control their personal information.

3. Our Commitment

Kaleyra is committed to ensuring protection of all personal information that we hold, and to provide and to protect all such data. We recognise our obligations in updating and expanding this program to meet the requirements of GDPR.

Kaleyra is dedicated to safeguarding the personal information under our control and in maintaining a system that meets our obligations under the new regulations. Our practice is summarised below.

4. How We Prepared for GDPR

The below is a list of changes and amendments which have taken place to ensure Kaleyra is GDPR compliant

- **Data Privacy Assessment**

We have carried out a Data Privacy Assessment and identified the extent of PII obtained, stored, collected, processed and shared.

- **Privacy Policy**

We have revised our Privacy Policy to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information. The details of the same may be obtained from the link

<https://www.kaleyra.com/privacy-policy/>

- **Obtaining Consent**

We have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information

- **Privacy by Design**

We have re-engineered the way our platform works by re-looking into the principles of Privacy at each stage and by focusing on end-to-end Security.

- **Policies and Procedures**

We have revised the data protection policies and the organisation Standard Operating procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

1. Data Protection – our main policy and procedure document for data protection has been revised to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy and the rights of individuals.
2. Data Retention and Erasure – we have updated our retention policy and schedule to ensure that we meet the “data minimisation” and “storage limitation” principles and that personal information is stored, archived and destroyed in accordance with our obligations. We have procedures in place to meet the new “Right to Erasure” obligation.
3. Data Breaches – our procedures ensure that we have safeguards in place to identify, assess, investigate and report any personal data breach as early as possible. Our procedures have been explained to all employees.
4. International Data Transfers and Third-Party Disclosures – where Kaleyra stores or transfers personal information outside the EU, we have robust

procedures in place to secure the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as binding rules, or standard data protection clauses for those countries without.

5. Data Subject Access Request (SAR) – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge

- **Additional Measures for Data Protection**

Kaleyra already has a consistent level of data protection and security across our organisation and has introduced additional measures to ensure compliance.

- **Direct Marketing**

We have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.

- **Data Protection Impact Assessments (DPIA)**

Where we process personal information that is considered high risk, we have developed stringent procedures for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements. We have implemented documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).

- **Data Processor Agreements**

Where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting, etc), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they meet and understand their/our GDPR obligations.

5. Data Subject Rights

We provide easy-to-access information via our website <https://www.kaleyra.com/>, in the office, during induction, training, etc., of an individual's right to access any personal information that Kaleyra processes about them and to request information about:

- what personal data we hold about them
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- how long we intend to store your personal data for
- if we did not collect the data directly from them, information about the source
- the right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- the right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use

- the right to lodge a complaint or seek judicial remedy and who to contact in such instances.

Further we have updated our terms of Use which can be downloaded at

<https://www.kaleyra.com/>

Information Security and Technical and Organisational Measures

Kaleyra takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction.

GDPR Roles and Employees

Kaleyra have designated Mr. Avv. Marco Maglio as our Data Protection Officer (DPO) and have appointed a data privacy team to develop and implement our roadmap for complying with the new data protection Regulation. The team are responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR compliance, identifying any gap areas and implementing the new policies, procedures and measures. They are also responsible for continuously monitoring their enforcement and update.

Kaleyra understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans.

If you have any questions about our GDPR compliance policies, please contact our Data Protection Officer (DPO) at dpo@kaleyra.com

Last updated: 12 February 2019.

Equal Employment Opportunity Statement:

Kaleyra is committed to create a diverse environment and is proud to be an equal opportunity employer. All qualified candidates will be considered without any regard to their race, colour, religion, gender, gender identity or expression, sexual orientation, nationality disability, or age.

Recruitment Privacy Notification

If you have submitted your profile to Kaleyra, be informed that we have processed your personal data in accordance with our internal hiring policies. Kaleyra understands the importance of protecting your personal data. Since, we are a GDPR complied company, we would want to invite your attention to our Privacy Policies and Recruitment Statement which is effective.

Kaleyra is committed in protecting your personal information and it will be used appropriately for evaluation of the candidature. The information collected will be used to

serve hiring purpose as a part of Kaleyra's recruitment process, including processing of the data by authorised third parties, as and when required. Your information will be held with Kaleyra only as long as necessary and for the purpose of hiring and will be available in the database for a period of one (1) year irrespective of the selection or rejection.

By proceeding and providing information asked herein, you agree that you have read Kaleyra's privacy policy and fully understand your rights to access, correct, erase, object to processing, restrict to processing or withdraw your personal information anytime and seek a copy of the personal information.