1. PREAMBLE

This Privacy Policy applies to the website:

www.lieesarlci.com

and to the services provided by the Liée group of companies, including:

- Liée Sarl, incorporated in Côte d'Ivoire;
- Liée Sarl (Pty) Ltd, incorporated in South Africa; and
- Liée B.V., incorporated in the Netherlands,

collectively referred to in this Privacy Policy as "Liée", "we", "our" or "us".

This Privacy Policy explains how Liée collects, uses, stores, transfers, discloses and protects personal data.

Liée is committed to protecting the privacy, confidentiality and security of personal data in accordance with applicable data protection and privacy laws, including where applicable:

- the EU General Data Protection Regulation ("GDPR");
- the South African Protection of Personal Information Act ("POPIA");
- Côte d'Ivoire data protection regulations; and
- other applicable international privacy and data protection laws.

For purposes of applicable data protection legislation, the relevant Liée entity providing the services shall generally act as the data controller unless otherwise specified.

2. DATA SUBJECTS

For purposes of this Privacy Policy, we may process personal data relating to:

- visitors to our website;

- prospective clients;
- clients and their representatives;
- newsletter subscribers;
- suppliers and service providers;
- candidates and employment applicants;
- employees and contractors;
- workers engaged under staffing or Employer of Record arrangements;
- individuals referenced during HR consultancy assignments;
- persons submitting enquiries or reviews;
- users accessing employee handbook or HR systems operated by Liée.

Separate privacy notices or policies may apply to:

- employment applicants;
- employees;
- workers under Employer of Record arrangements; and
- users of dedicated employee platforms or systems.

Such notices are made available where relevant.

3. PERSONAL DATA WE MAY COLLECT

Depending on the nature of our relationship with you, we may collect and process the following categories of personal data:

3.1 Identity and Contact Information

Including:

- name;
- job title;
- employer;
- postal address;
- email address;
- telephone number;
- social media identifiers;

- IP address;
- communication records.

3.2 Financial and Transaction Information

Including:

- billing information;
- bank account details;
- payment records;
- invoicing records;
- tax-related information.

3.3 Technical and Website Usage Information

Including:

- browser type;
- device identifiers;
- operating systems;
- website interaction data;
- cookies and analytics data;
- browsing activity;
- newsletter engagement metrics.

Please also refer to our Cookie Policy.

3.4 Employment and HR Information

Where relevant to the Services provided, we may process:

- CVs and employment histories;
- payroll information;
- attendance records;
- disciplinary records;
- performance information;
- immigration and right-to-work documentation;
- occupational health information;
- recruitment-related data.

3.5 Special Category / Sensitive Data

Where required by law or necessary for delivery of HR, payroll, occupational health or workforce management services, we may process special category or sensitive personal data, including:

- health information;
- disability information;
- criminal record information;
- diversity or demographic information.

Such data shall only be processed:

- where legally permitted;
- with appropriate safeguards;
- where necessary for employment or legal obligations; or
- with valid consent where required.

4. PURPOSES FOR PROCESSING PERSONAL DATA

We may process personal data for the following purposes:

- providing HR consultancy and advisory services;
- recruitment and staffing activities;
- Employer of Record and payroll services;
- onboarding and workforce administration;
- training and coaching services;
- occupational health coordination;
- immigration and mobility support;
- compliance and regulatory obligations;
- communication and relationship management;
- responding to enquiries;
- maintaining business records;
- invoicing and payment administration;
- fraud prevention and cybersecurity;
- maintaining security of systems and infrastructure;
- improving website performance and user experience;
- marketing and business development;
- newsletter administration.

5. LEGAL BASIS FOR PROCESSING

Depending on the applicable jurisdiction and circumstances, we process personal data based on:

- performance of a contract;
- legitimate business interests;
- legal obligations;
- consent;
- employment obligations;
- protection of vital interests;
- establishment, exercise or defence of legal claims.

Where processing is based on consent, consent may be withdrawn at any time.

6. SHARING OF PERSONAL DATA

We may share personal data where reasonably necessary with:

- affiliated Liée entities;
- professional advisers;
- accountants and auditors;
- payroll providers;
- cloud and IT service providers;
- occupational health providers;
- recruitment partners;
- immigration specialists;
- regulators and authorities;
- banking and payment service providers;
- legal advisers;
- subcontractors and consultants.

We do not sell personal data to third-party data traders.

All third-party service providers are expected to implement appropriate confidentiality and security measures.

7. INTERNATIONAL DATA TRANSFERS

Due to the international nature of our operations, personal data may be transferred to or accessed from:

- Côte d'Ivoire;
- South Africa;
- the Netherlands;
- the European Union; and
- other jurisdictions where our service providers or partners operate.

Where international transfers occur, we implement reasonable safeguards and contractual protections in accordance with applicable law.

8. DATA SECURITY AND PROTECTION

Liée implements reasonable technical, organisational and administrative security measures designed to protect personal data against:

- unauthorised access;
- loss;
- misuse;
- disclosure;
- alteration;
- destruction.

These measures may include:

- access controls;
- encryption;
- secure hosting environments;
- firewalls;

- password protection;
- periodic system monitoring;
- confidentiality obligations.

While we strive to protect personal data, no electronic transmission or storage system can be guaranteed to be completely secure.

9. DATA RETENTION

Personal data shall be retained only for as long as reasonably necessary:

- to fulfil the purposes for which it was collected;
- to comply with legal obligations;
- to resolve disputes;
- to enforce agreements;
- to maintain required business and employment records.

Retention periods may vary depending on:

- the type of data;
- legal requirements;
- regulatory obligations;
- operational necessity.

10. YOUR RIGHTS

Subject to applicable laws, individuals may have rights including:

- the right to access personal data;
- the right to correct inaccurate data;
- the right to request deletion;
- the right to object to processing;
- the right to restrict processing;
- the right to data portability;
- the right to withdraw consent;
- the right to lodge a complaint with a supervisory authority.

Requests may be submitted to:

Email: info@lieesarlci.com

We may require verification of identity before responding to requests.

11. EMAIL MARKETING

Where you subscribe to our newsletter, request information or otherwise demonstrate interest in our services, we may send marketing communications relating to:

- HR updates;
- workforce trends;
- regulatory developments;
- service offerings;
- company news.

Marketing communications may contain:

- tracking pixels;
- clickable tracking links;
- engagement analytics.

These technologies may collect data such as:

- email opens;
- clicks;
- IP addresses;
- approximate location;
- device information;
- engagement history.

You may unsubscribe from marketing communications at any time using the unsubscribe link provided in communications or by contacting us directly.

12. COOKIES AND WEBSITE ANALYTICS

Our website may use cookies and analytics technologies to:

- improve functionality;
- analyse website traffic;
- personalise user experience;
- support marketing activities.

Further information is available in our Cookie Policy.

13. THIRD-PARTY WEBSITES

Our website may contain links to third-party websites or platforms.

Liée is not responsible for the privacy practices, content or security of third-party websites.

Users should independently review the privacy policies of such third parties.

14. CHILDREN'S PRIVACY

Our services and website are not intended for children unless specifically relevant to lawful employment or educational initiatives.

We do not knowingly collect personal data from children without appropriate legal basis or consent where required.

15. CHANGES TO THIS PRIVACY POLICY

Liée reserves the right to amend, revise or update this Privacy Policy at any time.

Updated versions shall be published on our website together with the revised "Last Updated" date.

Continued use of our website or services following publication of updates constitutes acceptance of the revised Privacy Policy.

16. CONTACT DETAILS

For questions regarding this Privacy Policy or our processing of personal data, please contact:

Liée Group
Email: info@lieesarlci.com
Website: www.lieesarlci.com

Version 1.0

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