

Privacy Statement

2026 – Version 1.14

Introduction

This Privacy Statement is written by Dialog B.V. Dialog is the developer of the Online platform.

As developers, we understand that valuable and potentially sensitive Data is stored in the Online platform. We consider privacy and security of Data important and value that you, as an End user, understand how we handle your Data and that of your organisation.

In this Privacy Statement we explain this further and point out your rights under the GDPR.

For the data that your employer has processed in the platform, your employer is the controller. Dialog is the processor and acts exclusively on the instruction of your employer. You direct requests about your data in principle to your employer; Dialog supports this.

What means what

We think it is important that we understand the same thing by the following terms.

Parties

Dialog: Dialog B.V. (Chamber of Commerce number 84510722) is the name of the company that conceived, developed and maintains the Online platform.

Online platform: By this we mean Dialog's Online platform, found at <https://app.dialog.nl/>.

Client: The organisation that purchases a licence to the Online platform or makes use of Dialog's services.

End user: These are employees who work at the Controller who use or will use the Online platform.

Manager: These are the Managers of End users.

Administrator: These are those within the Controller who are responsible for managing the Online platform.

Data Subjects: These are living, natural persons whose Data is Processed in the Online platform. In this case these are the End users, Managers and Administrators of the Controller who will use the Online platform. In addition, external parties who give feedback to End users, such as customers, are also Data Subjects.

Data

Personal data: This is Data that can be traced back to an individual and relates to the person.

User information: This is information that an End user fills in in the Online platform. Think of business and development objectives, received and given feedback and written evaluations.

Organisation-Specific Information: This is information about the structure of an organisation, organisation and team objectives, core values and competencies and information about the appraisal cycle.

Data: The collective term for Personal data, Organisation-Specific Information and User information.

GDPR terminology

Processing: We speak of Processing when we record, modify, collect, organise, structure, store, update, retrieve, consult, use, provide by means of transmission, dissemination or otherwise making available, align or combine, restrict, erase or destroy Data.

Controller: This is the organisation that instructs Dialog to Process Data.

Processor: Dialog Processes Data on the instruction of the Controller and is thereby the Processor.

Subprocessors: A Subprocessor is a party that Processes Data on behalf of Dialog for the Controller.

Supervisory authority: This is the independent government body responsible for supervising compliance with the law in connection with the Processing of Data. In the Netherlands this is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Data breach: This is a breach of the security of Data that accidentally or unlawfully leads to the destruction, loss, alteration or unauthorised disclosure of, or unauthorised access to, transmitted, stored or otherwise processed data.

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1. Processing of Data

The organisation you work for is going to work on renewing or improving their HR cycle and uses (among other things) Dialog's Online platform for this.

To be able to do this, Data must be Processed. In this chapter we explain why, which and when Data is Processed. In addition, we address Opt-out options and when Data is deleted again.

1.1 Why is Data Processed

Dialog Processes Data so that you can use the Online platform (and associated services). Dialog processes this Data on the instruction of your employer, for the purposes determined by your employer, namely:

1. Registering a new account for the online platform on the basis of a name, email address and password;
2. Providing services for recording objectives and measurable results;
3. Providing services for recording progress on these objectives;
4. Providing services for recording evaluations and appraisals;
5. Providing services for recording feedback;
6. Sending emails to End users. This includes emails that remind you of your objectives, but also when you have received feedback or can fill in an evaluation form.

1.2 Whose Data is Processed

Data of the following persons is Processed by Dialog:

7. End users who work at (or for) the Controller who use the Online platform when renewing or improving their appraisal cycle.
8. When feedback is requested from external parties outside the organisation of the Controller, Data of these external parties is also Processed.

1.3 Which Data is Processed

We make the distinction into four types of Data: Personal data, Organisation-Specific Information, User information, and Non-personally identifiable Data.

1.3.1 Personal data

Category	Description
Name	The full name of the End user.
E-mail address	(Work) email address of the End user.
Phone number	(Work) phone number of the End user (optional).
IP address	The IP address of the End user's device.
Gender	The gender of the End user (optional).
Date of birth	The date of birth of the End user (optional).

1.3.2 User and organisation-specific information

User and organisation-specific information is only processed within the modules that are used by the Controller.

General

The following information is processed in all modules.

Category	Type	Description
Job title	User	This is the job title linked to the End user in the Online platform.
Organisation structure	Organisation	Overview of the organisation structure. Comparable to an org chart.
Job profiles	Organisation	The job titles and associated profiles.
Usage data	User	Non-substantive data about the use of the Dialog Online platform. Think for example of how often someone logs in, requests feedback or reflects. With this we can, among other things, send more relevant messages to End users.
Start date of	User	The date on which the End user joined the

Category	Type	Description
employment		company.

Performance

The following information is only processed if the Performance module is used.

Category	Type	Description
Performance objectives	User	Name and description of the End user's performance goals. This can be linked to the organisation or team goals to which these objectives contribute.
Development objectives	User	Name and description of the End user's development goals. This can be linked to a competency or core value.
Evaluations	User	Written reflections and evaluations by and about the End user.
Feedback	User	Written feedback that the End user has received and given in the Online platform.
Private notes	User	Employees, Managers and Administrators can keep private notes on End users in the Online platform.
Organisation and team objectives	Organisation	Description of the organisation and team objectives.
Core values and competencies	Organisation	Description of the core values, job-specific and team-specific competencies.
Evaluation cycle	Organisation	Information about the organisation's evaluation cycle.
Discussion points 1:1	User	Discussion points that Managers and Employees can record in the platform.

Engagement

The following information is only processed if the Engagement module is used.

Category	Type	Description
Answers	User	End users can answer questions from which the engagement of the end user on various themes is measured.
Themes & Questions	Organisation	The organisation can add themes and questions about which employees receive questions.

Talent

The following information is only processed if the Talent module is used.

Category	Type	Description
Competencies	User	At what level various competencies are mastered by the End user.
Skills	User	At what level various skills are mastered by the End user.
Ambitions	User	The End user can mark job titles as an ambition.
Extended job profiles	Organisation	The Organisation can extend job profiles with information about skills and growth opportunities.

1.3.3 Non-personally identifiable Data

When End users, Managers and Administrators explicitly give consent for the use of their Data for improving the platform, we also Process Data in a way that cannot be traced back to a person. This Data helps us to get a better picture of how End users use the Online platform.

1.4 When is Data Processed

1.4.1 Data that we always Process

Data is Processed when you, as an End user, use the Online platform. For example, Processing is done when you register for the Online platform, update your goals, and give or request feedback to/from others.

For most of the actions you perform as an End user, Data is Processed at the back end.

1.4.2 Data that we only Process after your consent

PostHog

To improve the platform and understand how it is used, Dialog uses PostHog, a tool for product analysis. With this we record how users navigate through the platform and which features they use.

PostHog is set up at Dialog in such a way that nothing is stored or read on your device: no cookies or comparable techniques are placed (PostHog runs in 'memory' mode). Therefore no cookie consent is required for this. When reloading or closing the platform, this information in your browser is lost; in a new session we recognise you again on the basis of your user ID from your session.

We encrypt (hash) that user ID before it goes to PostHog, so that PostHog cannot directly identify you. It nevertheless remains pseudonymous personal information: because we can recognise you across sessions, this is a personal data within the meaning of the GDPR.

For this processing, Dialog is itself the controller. The basis is Dialog's legitimate interest in improving and securing the platform (art. 6(1)(f) GDPR). Your employer determines whether this product analysis is enabled for the entire organisation; if your employer disables this, no analysis takes place for anyone within that organisation. We therefore do not ask for individual consent for this. PostHog is procured via the EU cloud, so that your data is processed within the EEA.

Survicate

We use Survicate to systematically collect feedback by means of micro-surveys, which can be sent via in-app, mobile, email or a link. These surveys typically measure the Net Promoter Score (NPS), the Customer Effort Score (CES) or customer satisfaction (CSAT), and may contain additional questions. A typical survey asks for a rating, followed by an optional free-text explanation.

For this processing, Dialog is itself the controller. The basis is Dialog's legitimate interest in improving and securing the platform (art. 6(1)(f) GDPR). Our legitimate interest is increasing the quality of our products and services and providing the best possible user experience. We use the feedback to develop our products in the direction our customers want and to continuously improve the overall quality.

We do not contact you if you do not respond to the survey, which means that you yourself determine when personal data is used. We also use your data to prevent the Survicate survey from appearing every time you log in, so that you have a smoother experience with our product or service.

The purpose of processing personal data is managing your feedback. This includes recording your score or comments from the Survicate survey. We use this data to better understand your needs and to inform you about any actions taken in response to your feedback. We may contact you to clarify your feedback, follow up on it or to request additional feedback.

1.4.3 Customer service

When you contact our Support team via the Help widget in the Online platform or send an email to support@dialog.nl, we Process your Data to be able to answer your question or to be able to solve your problem.

1.4.4 Product development

Your Data is never used when designing or building new functionality for the Online platform. We use fictitious Data and personas for this.

1.5 Opt-out

1.5.1 What can I opt out of?

As a user, you can unsubscribe from a part of the emails you receive from the Online platform.

- Reminders to update your goals
- Reminders to fill in an evaluation for others

You can unsubscribe from these emails at any time by using the unsubscribe link in the emails or via the Messages settings in the platform.

In addition, you can at any time withdraw the consent you have given us to use your Data to improve the online platform. You can do this via the account settings screens.

1.5.2 What can I not opt out of?

You cannot unsubscribe from all emails. You cannot unsubscribe from the following emails:

- Invitation to start with the Online platform
- Invitation to give feedback
- Emails about colleagues who have sent you a message via the Online platform
- Reminders of the invitation to give feedback
- 'You have received feedback' emails
- 'You have received a response to given feedback' emails
- Invitation to fill in your own evaluation
- Invitation to set new goals
- 'A colleague has left a comment on your goals' emails

1.6 When is Data deleted?

Dialog does not keep Data longer than necessary. When we no longer need Data, we delete it. In the following two situations we delete Data.

1.6.1 Leaving employment

When you, as an employee, leave the employment of the organisation that uses the Online platform, your (former) employer will stop your account and delete your Data. Dialog applies, in accordance with the arrangements with your employer, a deletion period of thirty days after termination of the account or the agreement.

This thirty-day delay is built in to be able to retrieve any wrongly deleted Data.

1.6.2 Organisation (unit) stops using the Online platform

When an organisation that uses the Online platform decides to stop with this, all Data is deleted thirty days after the expiry of the agreement between the organisation and Dialog.

When an organisation unit, after consultation with the rest of the organisation, decides to stop using the Online platform, all Data of this organisation unit is deleted thirty days after the signal from the client of the Organisation.

2. Who sees which information

The Online platform is built in an enormously flexible way to deal with different wishes of customers. There is no unambiguous answer to who may see what. This lies entirely in the

hands of the Controller. For example, a Controller chooses itself whether End users may see each other's goals, who fills in which evaluations, and whether job titles are shown in the Online platform. In addition, there are other settings that can ensure that End users can or cannot see Data.

Most of the functionalities in the Online platform are provided with an explanation about who may see what. Should you nevertheless have questions about who may see what, you can of course always ask us.

- Are you an end user or Manager in the Online platform and curious about who may see what? Then ask your question to the contact person within the organisation who deals with the Online platform. Often this is the HR manager.
- As an Administrator, you can contact our Support team directly. This can be done via support@dialog.nl or via our telephone number 030 7600 290.

3. Source of the data

If you work at an organisation that deploys the Online platform, then your first name, surname and email address have been provided to Dialog. With this Data, an invitation for your account has been set up by your Manager or Administrator via the 'Team' screens. As a result of this invitation, you receive an email containing a unique invitation link to register yourself for the Online platform.

Other Data results from the use of the Online platform.

4. Rights under privacy legislation

As an End user, you have several rights under the GDPR. You direct requests about your data (access, rectification, restriction, objection, data portability) to your employer as controller. If you submit a request directly to Dialog, we forward this to your employer and support the handling.

5. Security of data

Dialog ensures appropriate technical and organisational measures to secure Data against loss and against any form of unlawful Processing.

An explanation of these measures can be found in our Security policy. This can be requested by the Controller by sending an email to support@dialog.nl.

6. Data shared with third parties

For certain services, a part of your Data is provided to third parties. We call these third parties Processors. This Processing is necessary for an optimal experience of the Online platform. Processors do not have access to all Data, but only to the Data they need to be able to perform their function.

Dialog never sells or rents your Data.

6.1 What functions do the Processors have

Processors only receive the data they need to perform their function.

Category	Subprocessor name	Explanation
Platform optimisation	Posthog, Inc.	In Posthog, the use of the platform is tracked in order to continuously improve the service.
Platform optimisation	Survicate	With Survicate we collect feedback by means of an anonymous query in the product.

6.2 Where do Processors store their Data

Subprocessor name	Head office location	Data centre location	Data centre within the EU?
Posthog, Inc.	United States	Germany	Yes
Survicate	Poland	European Union	Yes

Dialog reserves the right to provide (part of) Data in the event of a transfer of ownership, for example through a merger or acquisition by another company.

6.3 Which Data do Processors receive

Processors only receive Data they need to perform their function. If a Processor does not need the Personal Data, then the Processor does not receive the Data.

Category	Posthog, Inc.	Survicate
General		
Job title	Yes	Yes
Usage data	Yes	No
Organisation ID	Yes	Yes

7. Changes to this Privacy statement

If Dialog decides to change this Privacy Statement, these changes are immediately implemented in this Privacy Statement. We therefore advise you to consult this Privacy Statement regularly so that you are aware of any changes.

If you have questions or requests about this Privacy Statement, you can make this known by sending an email to support@dialog.nl.

Dutch law applies to the legal relationship between you and Dialog, and the Processing of personal data therefore takes place in accordance with applicable Dutch laws and regulations in the field of privacy.