



XPLOR

INTERNAL DATA PROTECTION POLICY

25.05.2018

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XPLOR Privacy & Cookies

Please read this privacy notice (“Privacy Notice”) carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This Privacy Notice applies to any website, application or service which references this Privacy Notice. Where you provide us with your personal information in any of the ways described in section 2 below, you agree that we may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking (see section 3 below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

1. Who we are

This Privacy Notice applies to all products, applications and services offered by Xplor Business Solutions Limited., (a company incorporated in England with company registration number 10404303 and whose registered office address is Centrum House, 36 Station Road, Egham, United Kingdom, TW20 9LF), and its affiliates, but excludes any products applications or services that have separate privacy notices which do not incorporate this Privacy Notice.

2. How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services (including free trials); this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- interact with us using social media;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, fax, SMS, email or post.

We will also collect your information where you only partially complete and/or abandon any information inputted into our website and/or other online forms and may use this information to contact you to remind you to complete any outstanding information and/or for marketing purposes.

We also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites, applications or services (for example, we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information) and we will ask for your permission before we do so. We may do this using cookies or similar technologies (as described in section 11 below).

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

Providing us with information about others

If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent to provide us with the information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

3. How we use your information

To the extent permissible under applicable law, we use your information to:

- provide any information and services that you have requested or any applications or services that you have ordered;
- compare information for accuracy and to verify it with third parties;
- provide, maintain, protect and improve any applications, products, services and information that you have requested from us;
- manage and administer your use of applications, products and services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, website, applications and services and provide an enhanced, personal, user experience for you;
- undertake internal testing of our website, applications, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure it is only displayed at aggregated levels which will not be linked back to you or any living individual;
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- to monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual;
- deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
- deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers);
- and provide you with location- based services (for example, advertising and other personalised content), where we collect geo-location data.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with our website, applications and services;
- collect information about how you and users use the functions of the features of our website, applications and services; and
- gather statistical information about the operating system and environment from which you access our applications or services.
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You can manage your privacy settings within your browser or our applications and services (where applicable).

In addition to the purposes described in this section 3, we may also use information we gather to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful, based on your use of the website, applications or services or any other information we have about you (depending on the websites, applications or services, you may be able to configure these features to suit your preferences). Sections 5 and 6 of this Privacy Notice provides further details on how we will do this.

We may monitor and record our communications with you, including e-mails and phone conversations.

Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

Mobile data

We may obtain information through mobile applications that you or your users install on their mobile devices to access and use our website, applications or services or which you or your users use to provide other services related to that mobile application (for example, to sync information from our application or service with such mobile application). These mobile applications may be our own mobile applications or those belonging to third parties. Where the mobile application belongs to a third party, you must read that third party's own privacy notice as it will apply to your use of that third party mobile application. We are not responsible for such third party mobile applications and their use of your personal information.

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services. For example, activity undertaken within a mobile application may be logged.

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.

Data analytics and benchmarking

We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and/or solutions and the best experience. These purposes include to:

- deliver advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of services;
- carry out research and development to improve our services, products and applications;
- develop and provide new and existing functionality and services (including statistical analysis, benchmarking and forecasting services); and
- provide you with location based services (for example location relevant content) where we collect geo-location data to provide a relevant experience.

Whenever we use your information for our legitimate interests, we will ensure that your information is processed on a pseudonymised basis and displayed at aggregated levels, which will not be linked back to you or to any living individual.

You have the right to object to processing based on our legitimate interests, and if you wish to do so, please contact us at xplor.privacy@xplor-it.com to discuss this further. If you object, this may affect our ability to provide certain services and/or solutions for your benefit.

4. Sharing your information

We may share your information with:

- any company within the Xplor Group, for the purposes set out in this Privacy Notice, (e.g. global information and customer relationship management; software and service compatibility and improvements; and to provide you with any information, applications, products or services that you have requested);
- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- partners, including system implementers, resellers, value-added resellers, independent software vendors and developers that may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);
- third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations (such as banks, insurers, finance providers), payment solutions providers, software and services providers that provide business solutions);
- credit reference and fraud prevention agencies;
- regulators to meet Xplor Group's legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own and Xplor Group professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets;
- another organisation to whom we may transfer our agreement with you; and
- Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties but this will not include information that can be used to identify you.

5. Marketing

From time to time, we may use your information to contact you with details about our applications, products and services which we feel may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) may contact you with information about their products or services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your information on our websites, applications or services, using any preference centres we give you access to or by sending us an email to xplor.privacy@xplor-it.com. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

Third party platform advertising

Where you respond to communications we post on third-party platforms (such as Facebook, Google and Twitter), we may also share your information with those third parties in order to serve targeted advertising/content to you via the relevant third party platform based on your profile/interests. Your information is used by the third-party platform provider to identify your account and serve advertisements to you. You can control what advertisements you receive via the privacy settings on the relevant provider's platform and you should consult the third party's help/support centre for more information.

6. Your information and your rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible ("data portability");
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner's Office).

If you request a copy of your information you may be required to pay a statutory fee.

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with the Xplor Group Data Retention, Marking and Destruction Policy or as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

7. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. However we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Notice).

8. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your information which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.



If you believe your account has been compromised, please contact us at xplor.privacy@xplor-it.com.

9. Transfers outside of the European Economic Area

Personal information in the European Union is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

Our website and some of our applications or services or parts of them may also be hosted in the United States or otherwise outside of the EEA (which means all the EU countries plus Norway, Iceland and Liechtenstein) ("EEA") and this means that we may transfer any information which is submitted by you through the website or the application or service outside the EEA to the United States or to other territories outside of the EEA. When you send an email to us, this will also be stored on our email servers which are hosted in the United States.

We may use service providers based outside of the EEA to help us provide our website, applications and services to you (for example, platform and payment providers who help us deliver our applications and services, or advertising or execute your payments) and this means that we may transfer your information to service providers outside the EEA for the purpose of providing our applications, advertising and services to you.

We take steps to ensure that where your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations. For example, we may share information with our group companies or affiliates based outside the EEA for the purposes envisaged by this Privacy Notice. All Xplor group companies are subject to Xplor group data protection policies designed to protect data in accordance with EU data protection laws. In each case, such transfers are made in accordance with the requirements of Regulations (EU) 2016/679 (the General Data Protection Regulations or "GDPR") and may be based on the use of the European Commission's Standard Model Clauses for transfers of personal data outside the EEA.

By using our website, products or services or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer of your information outside the EEA in the circumstances set out in this Privacy Notice. If you do not want your information to be transferred outside the EEA you should not use our website, applications or services.

10. Other sites and social media

If you follow a link from our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

11. Cookies, Analytics and Traffic Data

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications and services better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or persistent cookies (cookies which enable our websites, applications or services to “remember” who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

We use the following different types of cookies:

Strictly necessary cookies

These are cookies which are needed for our websites, applications or services to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

Performance cookies and analytics technologies

These cookies collect information about how visitors and users use our websites, applications and services, for instance which functionality visitors use most often, and if they get error messages from areas of the websites, applications or services. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications and services work.

Functionality cookies

These cookies allow our websites, applications and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Targeting or advertising cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Web beacons and parameter tracking

We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

IP Address and traffic data

We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours and the website you visit after leaving our site. We also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

Find out more about the individual cookies and analytics technologies that we use.

| Description | Purpose |
|------------------|--|
| Google analytics | Google Analytics uses "cookies", to help the website analyse how users use the websites, applications or services. The information generated by the cookie about your use of the |

| | |
|----------------|--|
| | <p>websites, applications or services (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the websites, applications or services compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of this website. By using our websites, applications or services you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see "How Google uses data when you use our partners' sites or apps", (located at www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time).</p> |
| Salesforce.com | <p>Salesforce.com uses the Salesforce.com platform. You can view Salesforce.com's privacy statements here which contain details of any cookies and analytics that are used within its platform and services: https://help.salesforce.com/apex/HTViewSolution?urlname=Cookies-in-the-Force-com-Platform&language=en_US and http://www.salesforce.com/company/privacy/full_privacy.jsp No service user data is maintained on the Salesforce web or application servers. Instead, after the user authenticates, the application generates a "cookie" for that user for only that session, with the following information: a version number that identifies the format of the cookie, a number that acts as the session ID and a routing hint."</p> |

[How to disable cookies](#)

You may be able to configure your browser or our website, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, applications or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the www.allaboutcookies.org/ website.

12. Further information

If you have any queries about how we treat your information, the contents of this Privacy Notice, your rights under local law, how to update your records or how to obtain a copy of the information that we hold about you, please send an email to **xplor.privacy@xplor-it.com** or by letter to the following address: 10 Bloomsbury Way WC1A 2SL London