

# Nionnet Privacy and Cookie Policy

This privacy policy outlines how we may use your personal information and forms part of the Terms of Use of the Websites. It is compliant with The Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR) 2018.

In this document "Personal Information" refers to any information which refers to you personally such as your name, e-mail address and postal address. Please read this privacy policy carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This notice applies to any website, application or service which references this policy.

Where you provide us with your personal information in any of the ways described below, you agree that we may collect, store and use it:

- in order to perform our contractual obligations to you,
- based on our legitimate interest for processing (i.e. for internal administrative purposes or for the detection or prevention of crime) or
- based on your consent, which you may withdraw at any time, as described in this policy.

This privacy policy may be updated from to time. The date of the most recent revisions will appear on this page so please visit this privacy policy regularly.

## 1. Who we are

Our privacy policy applies to all products, applications and services offered by NionNet Limited (a company incorporated in England with company registration number 8700122 and whose registered office address is 23a The Precinct, London Rd, Waterlooville PO7 7DT), and its affiliates, but excludes any products applications or services that have separate privacy policies which do not incorporate this privacy policy.

## 2. Privacy Statement for NionNet websites

Your privacy is very important to us, and we understand how important it is to you. Our aim is to be as clear and open about what we do and why we do it. NionNet is committed to the online, and offline, privacy of all its users.

## 3. When We Collect Data

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

- enter into a contract with us for Development Work, Ongoing Maintenance, End User License Agreements and Service Level Agreements;
- 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, or participate in any interactive areas that may appear on our website or within our application or service);
- interact with us using social media;
- contact us offline, for example by telephone, SMS, email or post.
- apply for jobs with us;
- contact us with a question or complaint.



We will also collect your information where you only partially complete and/or abandon your application on our website and/or other online forms and we will ONLY use this information to contact you to remind you to complete any outstanding information should you wish to. After 3 days the information is permanently deleted.

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 ALWAYS ask for your permission before we do so. We may do this using cookies or similar technologies (as described).

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.

If you intend giving us personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protections laws. In so far as required by applicable data protection laws, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our privacy policy.

#### **4. What Information Do We Collect?**

The personal information we may collect from you includes your:

- name;
- postal address;
- phone number (land line, mobile and fax);
- email address;
- Login in details where appropriate

#### **5. How We Use the Information We Collect**

When you give us any personal information as indicated above, we use your personal information to:

- deliver any contacts with you for Development Work, Ongoing Maintenance, End User License Agreements and Service Level Agreements;
- Issue reminders and invoice;
- enable you to become a registered user on one or more of our websites;
- process your transaction, licence or subscription and correspond with you accordingly;
- 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 and performance. In these circumstances, we would anonymise any information used for such testing purposes;



- 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.

To the extent permitted by applicable law, we retain information about you after the closure of your licence with us, if your application for a licence is declined or if you decide not to proceed. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

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.

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, 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).

We may monitor and record our communications with you, including emails 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.

## 6. 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 policy 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.

## 7. Fraud Prevention

In order to protect our customers and us from fraud and theft, we may look at the information that we get from making identity checks and other information in our customer records, including how you conduct your account, and may pass this to other group companies, and to financial and other organisations (including law enforcement agencies) involved in fraud prevention and detection, to use in the same way. When you apply for products or services through our website you may also be required to go through a more detailed credit check on terms which will tell you about you first.

## 8. Who We Share the Information With

We may share your information with:

- any company within NionNet Limited for the purposes set out in this privacy policy, (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 our 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 our 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 never include information that can be used to identify you.



## 9. 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;
- 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 policy, 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 our Data Protection Policy or as otherwise permitted applicable laws and regulation. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

## 10. Changes to our privacy policy

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

## 11. 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 [enquiries@nionnet.com](mailto:enquiries@nionnet.com).

## 12. 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 policy. All Sage group companies are subject to Sage 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 policy, you consent to the transfer of your information outside the EEA in the circumstances set out in this Privacy policy. If you do not want your information to be transferred outside the EEA you should not use our website, applications or services.

### **13. Other sites and social media**

If you follow a link from our website, application or service to another site or service, this 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 policy 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.

