

PRIVACY POLICY

Introduction

At NSYS we are committed to protecting and respecting the privacy of every individual, who's Personal Data is obtained by us. This Privacy Policy is to inform you how NSYS collects, uses, stores, transfers and protects Personal Data ("Process").

In this Privacy Policy terms "we", "us" and "our" refer to the following entities that may Process the Personal Data due to this Privacy Policy:

- a) Neva Systems Ltd., a company duly established and validly existing under the laws of England, UK, having its registered address at 8 Twisleton Court, Priory Hill Dartford, DA1 2EN, UK,
- b) together with its affiliates and other related entities (collectively – "NSYS").

If you wish to see a detailed list of all affiliates and other related entities, please refer to our contact person using the contact details provided in Section 15 of this Privacy Policy.

We are Processing Personal Data about:

- a) visitors of websites that are owned, licensed or operated by us,
- b) individuals who download and use our software products, mobile applications or other products or services, where this Privacy Policy is posted or linked, (hereinafter – "Services"),
- c) any other individuals whose Personal Data is provided by or obtained by us.

In this Privacy Policy "Personal Data" means information, which relates to the person and which identifies directly or indirectly the person as an individual, such as name, email address, telephone number etc. For a complete list of the Personal Data we process under this Privacy Policy, please refer to Section 1 of this Privacy Policy.

Unless we specify otherwise, we act as a data controller of Personal Data and shall comply with all applicable to the data controller data protection laws and regulations.

By visiting our websites and using our Services, you agree that your Personal Data will be Processed as described in this Privacy Policy. Any dispute over privacy is subject to this Privacy Policy and our Terms of Service, including its applicable limitations on damages and the resolution of disputes.

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1. What information do we collect and how?

We may collect the following Personal Data:

- a) **Common data.** Name, surname, nickname, company name, title, job responsibilities, country, phone number, email address, mailing address, bankcards numbers.
- b) **Registration data.** Login IDs, passwords, subscriptions, downloads.
- c) **Transmitted data.** Personal Information about your employees, vendors, contractors, business partners and other individuals; Personal Data contained in documents, letters, notifications or other correspondence.
- d) **Technical data.** IP address, browser type and version, time zone settings, browser plug-in types and versions, operating system, device type, unique identifiers and mobile network information, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform, full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse overs), methods used to browse away from the page and other information relating to the device and our websites usage.

As a general rule, NSYS does not Process any Personal Data that shall be categorized as Special Data, such as: race, sexual orientation, religious or philosophical beliefs, trade-union membership, or concerning health or sex life. By volunteering unsolicited sensitive Personal Data to us (e.g., by submitting your resume or a job application online), you expressly consent to your Personal Data being used as described in this Policy.

We also do not intend to Process children's Personal Data. Our Services are not designed and shall not be used by children.

Providing Personal Data to us is voluntary. If you do not provide Personal Data to us, you will not be able to benefit from some of the functionalities offered by our Services, such as communication, evaluation or service requests, enrolling in corporate events, downloading of documents or recruitment.

You can provide us with Personal Data by filling in forms on our website **www.nsysgroup.com** or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, participate in discussion boards or other social media functions on our site. It also included information you provide when you enter into promotion or survey activities and when you report a problem with our site through our websites, software, or a support platform.

With regard to each of your visits to our websites, we will automatically collect the information including the following but not limited to:

- a) as applicable, technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform etc.

- b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse overs), methods used to browse away from the page, and any phone number used to call to our customer service number.

While you provide us with Personal Data of third parties, such as your employees, vendors etc., we act as a processor of Personal Data, thus you are responsible for ensuring that any such Personal Data is transferred to us in full compliance with applicable data protection laws and regulations.

2. Information that we collect from additional social networking sites

Like most websites, we use Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google does not grant us access to this. We consider Google to be a third party data processor.

We may also receive Personal Data from other sources, including third parties (for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies etc.), and combine this information with the Personal Data we already have about you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you. Personal Data collected from third parties, for example from a tradeshow will share your information subject to the organizations respective privacy statements.

Should you choose to contact us using the contact form on our Contact us page or an email link, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in this document. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by SSL meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

3. How we use the information?

The purposes, for which Personal Data is collected, are described below, along with a brief description of how Personal Data may be handled in each case.

Any information you give to us may be used for the following purposes:

- a) to carry out our obligations to provide you with the information, products and Services that you request from us;
- b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;

c) to provide you, or permit selected third parties to provide you, with information about services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, you may contact us via e-mail or post (addresses given in this Privacy Policy).

d) to notify you about changes to our Services;

e) to ensure that content from our websites is presented in the most effective manner for you and for your computer.

f) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

g) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

h) to allow you to participate in interactive features of our Service, when you choose to do so;

i) as part of our efforts to keep our site safe and secure;

j) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

k) to make suggestions and recommendations to you and other users of our site about goods or Services that may interest you or them.

We may Process Personal Data for the purposes mentioned above only under lawful basis. It depends upon the categories of Personal Data Processed and the purpose of it. We Process Personal Data because of:

- a) our legitimate interest,
- b) our contractual obligations,
- c) legal obligation to do so,
- d) the explicit consent to Process Personal Data given by the Subject of Procession.

4. How we share the information?

We may share Personal Data as follows:

- a) each NSYS member may share Personal Data between each other to carry out our obligations to provide you with Services and for other purposes mentioned above,
- b) with selected third parties including: business partners, suppliers and sub-contractors for the performance of any contract we enter into with you;
- c) with analytics and search engine providers that assist us in the improvement and optimization of our Services,

We will disclose your Personal Data to third parties:

- a) In the event that we sell or buy any business or assets, in which case we will disclose Personal Data to the prospective seller or buyer of such business or assets.

- b) If NSYS or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- c) If we are under a duty to disclose or share Personal Data under the applicable law, or court order or other request from government and regulatory authorities, or any other legally enforceable demand, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of NSYS, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. Cross-Border Data Transfers

We may transfer Personal Data to our recipients mentioned above to other countries, including the countries that may provide less level of Personal Data protection to those in effect in your area of residence, for example United States. In case we collect Personal Data from individuals, whose country of residence is one of the countries of European Economic Area and transfer this Personal Data to non-EEA jurisdictions, who is not determined as having adequate level of data protection, we are using standard contractual clauses approved by the European Commission or other applicable under GDPR mechanisms.

6. Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We may use the information received from third parties for direct marketing and promotion purposes. Direct marketing and/or promotional efforts by or on behalf of NSYS may include providing you with specific information that you have requested online, providing more general information about other NSYS offerings, or enabling you to participate to online contests or to register for any sponsored events.

Except where you request otherwise, NSYS may keep your Personal Data on file for an appropriate time in order to consider you for employment opportunities with NSYS in the future.

7. Security of Personal Data

Security of Personal Data is a top priority for us. We take the utmost care of personal data when designing and developing and providing our Services. We are committed to be compliant with the GDPR policies regarding handling and storing of your personal information.

We use various technological and procedural security measures in order to protect the Personal Data we collect, use or transfer from loss, misuse, alteration or destruction. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the absolute

security of your Personal Data transmitted to us; any transmission is at your own risk. Once we have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorized access.

You should take steps to protect against unauthorized access to your app account, device, and computer by, among other things, signing off after using a shared computer, choosing an intricate password that nobody else knows or can easily guess, and keeping your log-in and password private to your devices.

8. Access to Personal Data

You have the right to access, review, correct, erase or otherwise modify any of the information or Personal Data that you have previously provided to us. You can exercise this right at any time by contacting us at compliance@nsysgroup.com or mail us at below address: 8 Twisleton Court, Priory Hill Dartford, DA1 2EN, UK.

NSYS offers its visitors and customers, who provide contact information means to choose how NSYS uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of our marketing emails. Additionally, you may unsubscribe here or by contacting us at compliance@nsysgroup.com.

9. Your rights

You have the following rights under the GDPR:

- 1) The right to request full particulars of data we collect about you.
- 2) The right to request that we correct any inaccuracies in the data we hold on you.
- 3) The right to object to processing of your data or restriction of processing of your data.
- 4) The right to request access to your data.
- 5) The right to request erasure of your data.
- 6) The right to data portability.
- 7) The right not to be subject to automated decision making including profiling.

If you have any questions, you can always reach us in privacy matters via email at compliance@nsysgroup.com

10. Data retention

We will not retain your data for longer than necessary and contrary to the purpose it has been collected. This means we will destroy or erase the data from our systems when it is no longer required.

When processing or retaining data, we ensure we comply with the following steps:

- a) Process and retain data in accordance with the purpose it has been collected and for period originally intended for the purposes of effecting our services.
- b) Comply with any law and/or contractual obligation.
- c) Comply with your specific instructions pertaining to your data processing and retention.

11. Cookies

Cookies are/may be used on this website. By using our website, you agree that cookies are to be placed on your device as further explained below. Cookies are small pieces of data that a website

sends to your computer's web browser while you are navigating through it. They have many different purposes, but mainly, cookies enable you to navigate between pages easily, to remember your preferences, and eventually to improve the user experience. These cookies may then be stored on your machine to identify your computer. Cookies used on this website can be either set up by our website or by a third-party website. Moreover, these cookies can be "session" or "persistent" cookies: a session cookie is a cookie that is automatically deleted when the user closes the browser, whereas a persistent cookie is a cookie that remains stored in the user's terminal device until it reaches a defined expiration date.

How to accept or refuse cookies: If you do not want to receive cookies from our website, you may set your browser to refuse cookies or to notify you when you receive a cookie, which you may then accept or refuse upon such notice. You can also generally set your browser to turn off cookies. To understand how to do this, please consult your browser's "Tools" section, or any other similar heading. We recommend that you leave the cookies active. Bear in mind that if you block, turn off or otherwise reject our cookies, some web pages may not display properly or you will not be able to use any website services that require you log in your account.

12. Third party websites

NSYS websites may provide links to third-party websites. NSYS does not make any representations or warranties with respect to such third-party websites. You should be aware that the owners and operators of such third-party websites might collect, use or transfer Personal Data under different terms and conditions than NSYS. Upon linking to a third-party website, you should inform yourself of the privacy policies of such third-party websites.

Our website is hosted by Microsoft Azure within a secure data center.

All traffic (transfer of files) between our website and your browser is encrypted and delivered over HTTPS.

13. Useful information about GDPR

You can obtain additional information about your rights under the GDPR by visiting the link below:

<https://ico.org.uk/for-organisations/resources-and-support/getting-ready-for-the-gdpr-resources/>

or by emailing us at compliance@nsysgroup.com.

14. Modifications or updates

NSYS reserves the right to update this Privacy Policy at any time and without notice. You will be automatically bound by these modifications when you use the website and you should therefore periodically read the Privacy Policy.

15. Contact us

Address:

8 Twisleton Court,
Priory Hill Dartford,
DA1 2EN, UK

Phone: +44 1634 756065

E-mail: sales@nsysgroup.com, compliance@nsysgroup.com