

## SAVVY.AI Privacy Policy

SAVVY.AI is committed to protecting and respecting your privacy.

Effective starting 2<sup>nd</sup> January 2019

### SAVVY.AI PRIVACY POLICY

This policy sets out:

- (a) What information we collect about you when you visit our website, use our products or services, or otherwise interact with us;
- (b) How we use, share, store, and secure the information; and
- (c) How you may access and control the information.

In this policy:

“personal information” refers to any data, information, or combination of data and information that is provided by you to us, or through your use of our products or services, that relates to an identifiable individual;

“Platform” means our website (<https://www.savvy.ai>) and our app; and

“SAVVY.AI” or “we” is as defined in our Terms of Service.

#### **1. What information we collect about you**

- (1) We collect the following types of information about you:
  - 1) Account and profile information that you provide when you register for an account or sign up for our products or services, for example your name, email address, physical address and telephone number (collectively, “Account Data”);
  - 2) Information you provide through our support channels, for example when you report a problem to us or interact with our support team, including any contact information, documentation, or screenshots (collectively, “Support Data”);
  - 3) Content you provide through use of our products or services, for example personal information contained in the documents that you create in our Platform (collectively, “User Content”);
  - 4) communication, marketing, and other preferences that you set when you set up your account or profile, or when you participate in a survey or a questionnaire that we send you (collectively, “Preference Data”);

- 5) Details of any transactions, purchases, or orders that you've made with us (collectively, "Transaction Data");
  - 6) Payment information, for example your payment card information or bank account details (collectively, "Financial Data");
  - 7) Information about your device or connection, for example your internet protocol (IP) address, login data, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our products or services and information we collect through cookies and other data collection technologies (please read our Cookies Policy for details) (collectively, "Technical Data"); and
  - 8) Information about your use of or visit to our Platform, for example your clickstream to, through, and from our Platform, products you viewed, used, or searched for, download or other errors, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods to browse away from the page (collectively, "Usage Data").
- (2) We collect the above information when you provide it to us or when you use or visit our Platform. We may also receive information about you from other sources, including:
- 1) Our personnel, agents and consultants in connection with our operations or services, for example our staff engaged in the fulfilment of your order, processing of your payment, and provision of support services;
  - 2) Other users of our products or services, for example when a member of your organisation registers an account for each team member on our Platform;
  - 3) Other services linked to your account, for example if you register or log in your account using your Google credentials, we receive your name and email address to authenticate you, as permitted by your Google profile settings;
  - 4) Our group companies or overseas offices that provide information technology, system administrative, and/or marketing services; and
  - 5) Our business partners and service providers who provide technical, payment, delivery services, advertising networks, analytics, market research, and search information services.
- (3) We do not collect sensitive data or special category data about you. This includes details about your race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, or sexual orientation.

## **2. How we use information we collect**

- (1) We only use your personal information where the law allows us to. We use your personal information only where:
  - 1) We need to perform the contract we have entered into (or are about to enter into) with you, including to operate our products or services, to provide customer support and personalised features, and to protect the safety and security of our Platform;
  - 2) It satisfies a legitimate interest which is not overridden by your fundamental rights or data protection interests, for example for research and development to improve our products or services, and in order to protect our legal rights and interests;
  - 3) You've given us consent to do so for a specific purpose, for example we may send you direct marketing materials or publish your information as part of our testimonials or customer stories to promote our products or services with your permission; or
  - 4) We need to comply with a legal or regulatory obligation.
- (2) If you have given us consent to use your personal information for a specific purpose, you have the right to withdraw your consent any time by contacting us (please refer to paragraph 9 for contact information), but please note this will not affect any use of your information that has already taken place.
- (3) We do not share your personal information with any company outside our group for marketing purpose, unless with your express specific consent to do so.
- (4) For visitors to or users of our Platform who are located in the European Union, we have set out our legal bases for processing your information in the Legal Bases Table at the end of this policy.

## **3. How we share information we collect**

- (1) We share information with other companies in our group in order to operate our Platform and to offer and improve our products and services.
- (2) We share information with third parties that help us operate, provide, support, improve, and market our products and services, for example third-party service providers who provide cloud hosting, maintenance, backup, storage, infrastructure, billing, payment processing, customer support, business analytics, and other services.
- (3) Third-party service providers have access to your personal information only for the purpose of performing their services and in compliance with applicable laws and regulations. We require these third-party service providers to maintain confidentiality and security of all personal information that they process on our behalf and to implement and maintain reasonable security measures to protect the confidentiality, integrity, and availability of your personal information.

- (4) We take reasonable steps to confirm that all third-party service providers that we engage process personal information in the manner that provides at least the same level of protection as is provided under this policy. Where any third-party provider is unable to satisfy our requirements, we will require them to notify us immediately and we will take reasonable steps to prevent or stop non-compliant processing.
- (5) If you use any third-party software in connection with our products or services, for example any third-party software that our Platform integrates with, you might give the third-party software provider access to your account and information. Policies and procedures of third-party software providers are not controlled by us, and this policy does not cover how your information is collected or used by third-party software providers. We encourage you to review the privacy policies of third-party software providers before you use the third-party software.
- (6) Our Platform may contain links to third-party websites over which we have no control. If you follow a link to any of these websites or submit information to them, your information will be governed by their policies. We encourage you to review the privacy policies of third-party websites before you submit information to them.
- (7) We may share your information with government and law enforcement officials to comply with applicable laws or regulations, for example when we respond to claims, legal processes, law enforcement, or national security requests.
- (8) If we are acquired by a third party as a result of a merger, acquisition, or business transfer, your personal information may be disclosed and/or transferred to a third party in connection with such transaction. We will notify you if such transaction takes place and inform you of any choices you may have regarding your information.

#### **4. How we store and secure information we collect**

- (1) We use cloud service providers to host the information we collect to enable us to operate as a global platform.
- (2) We have adopted the following measures to protect the security and integrity of your personal information:
  - 1) any document that you create, store, and e-sign in our app is stored in encrypted form on disk and securely transmitted with TLS/SSL encryption;
  - 2) any payment transactions are encrypted using TLS/SSL technology;
  - 3) your account is protected by passwords that must be at least 14 characters long;

- 4) access to your personal information is restricted to personnel or service providers on a strictly need-to-know basis, who will only process your information on our instructions and who are subject to a duty of confidentiality; and
  - 5) our information collection, storage, and processing practices are reviewed regularly.
- (3) We have put in place procedures to deal with any suspected privacy breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
  - (4) While we implement safeguards designed to protect your information, please note that no transmission of information on the Internet is completely secure. We cannot guarantee that your information, during transmission through the Internet or while stored on our systems or processed by us, is absolutely safe and secure.
  - (5) We only retain personal information for so long as it is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After such time, we will delete or anonymise your information, or if this is not possible, we will securely store your information and isolate it from further use. We periodically review the basis and appropriateness of our data retention policy.

## **5. How we transfer information internationally**

- (1) We collect information globally. We transfer, process, and store your information outside your country of residence where we or our service providers operate for the purpose of providing our products and services to you.
- (2) Some of the countries in which our companies or service providers are located may not have the privacy and data protection laws that are equivalent to those in your country of residence. When we share information with these companies or service providers, we make use of contractual clauses, corporate rules, and other appropriate mechanisms to safeguard the transfer of information.

## **6. Your rights**

- (1) You have the right to:
  - 1) Be informed of what we do with your personal information;
  - 2) Request a copy of personal information we hold about you;
  - 3) Require us to correct any inaccuracy or error in any personal information we hold about you;

- 4) Request erasure of your personal information (note, however, that we may not always be able to comply with your request of erasure if the personal information is still necessary for the purpose which we originally collected it for, or for record keeping or legal compliance purposes);
  - 5) Object to or restrict the processing by us of your personal information (including for marketing purposes);
  - 6) Request to receive some of your personal information in a structured, commonly used, and machine readable format, and request that we transfer such information to another party; and
  - 7) Withdraw your consent at any time where we are relying on consent to process your personal information (although this will not affect the lawfulness of any processing carried out before you withdraw your consent).
- (2) Our Platform enables you to update certain information about yourself, for example you may change your business or personal information by updating your account settings in our app.
  - (3) You may opt out of receiving marketing materials from us by using the unsubscribe link in our communications or by contacting us (please refer to paragraph 9 for contact information). Please note, however, that even if you opt out from receiving marketing materials from us, you will continue to receive notifications or information from us that are necessary for the use of our products or services.
  - (4) As a security measure, we may need specific information from you to help us confirm your identity when processing your privacy requests or when you exercise your rights.
  - (5) Any request under paragraph 6.1 will normally be addressed free of charge. However, we may charge a reasonable administration fee if your request is clearly unfounded, repetitive, or excessive.
  - (6) We will respond to all legitimate requests within one (1) month. Occasionally, it may take us longer than a month if your request is particularly complex or if you have made a number of requests.

## **7. Changes to this policy**

We may amend this policy from time to time by posting the updated policy on our Platform. By continuing to use our Platform after the changes come into effect, you agree to be bound by the revised policy.

## **8. Policy towards children**

Our products and services are not directed to individuals under 16. We do not knowingly collect personal information from individuals under 16. If we become aware that an individual under 16 has provided us with personal information, we will take steps to delete such information. Contact us if you believe that we have mistakenly or unintentionally collected information from an individual under 16.

## **9. Contact us**

- (1) Please contact us at [info@savvy.ai](mailto:info@savvy.ai).
- (2) Please contact us in the first instance if you have any questions or concerns. If you have unresolved concerns, you have the right to file a complaint with a data protection authority in the country where you live or work or where you feel your rights have been infringed.

## **10. COOKIES POLICY**

- (1) Cookies are small text files that are placed on your device by a web server when you access our Platform. We use cookies to identify your access and monitor usage and web traffic on our Platform to customise and improve our products and services.
- (2) We use both persistent cookies and session cookies. A persistent cookie stays in your browser and will be read by us when you return to our Site or a partner site that uses our services. Session cookies only last for as long as the session lasts (usually the current visit to a website or a browser session).

We use the following types of cookies:

- 1) Strictly necessary cookies – these are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our website.
- 2) Analytical/performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are easily finding what they are looking for.
- 3) Functionality cookies – these are used to recognise you when you return to our site.
- 4) Targeting cookies – these cookies record your visit to our site, the pages you have visited, and the links you have followed.
- 5) You can block cookies by activating the setting on your browser that allows you to refuse the use of all or some cookies. However, if you do so, you may not be able to access all or parts of our site.

## LEGAL BASES TABLE

<b>Processing purpose</b>	<b>Type of data processed</b>	<b>Legal basis</b>
To register you as a user on our app	Account Data with you	To perform our contract
To enable you to use our products and services	Account Data, Transaction Data, Support Data, Technical Data and User Content	To perform our contract with you
To process your payments	Account Data, Transaction Data, Financial Data	To perform our contract with you
To collect overdue amounts	Account Data, Transaction Data, Financial Data	Legitimate interest to recover debts due to us
To notify you about changes to our products, services, or terms	Account Data	To perform our contract with you
To administer and maintain safety and security of our Platform	Technical Data	To perform our contract with you
To study usage of our products or services	Transaction Data, Support Data, Technical Data, Usage Data	Legitimate interest to improve our Platform, products, and services
To gather feedback on our products, services, or feature	Account Data	Legitimate interest to improve our Platform, products, and services
To provide information on products or services that may be of interest to you	Account Data, Preference Data	Consent, which you may withdraw any time