

## Privacy Statement OES Group march 2020

OES Group is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, OES Group is committed to the appropriate protection and use of personal information (sometimes referred to as "personally identifiable information" or "PII"). If you have any questions, please contact us at [Sales@oesgrouppltd.com](mailto:Sales@oesgrouppltd.com).

### Personal Information OES Group collects and controls

We collect information about you only if we need the information for some legitimate purpose. OES Group will have information about you only if (a) you have provided the information yourself, (b) OES Group has automatically collected the information, or (c) OES Group has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

We only collect the information that we actually need. Some of that is information that you actively give us when you sign up for an account, register for an event, ask for customer support, or buy something from us. We store your name and contact information, but we don't store credit card numbers (except with your permission and in one of our secured payment gateways).

When you visit one of our websites or use our software, we automatically log some basic information like how you got to the site, where you navigated within it, and what features and settings you use. We use this information to improve our websites and services and to drive new product development.

### Information entrusted to OES Group and purpose

Information provided in connection with services : You may entrust information that you or your organization ("you") control, to OES Group in connection with use of our services or for requesting technical support for our products. This includes information regarding your customers, prospects and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). The data may either be stored on our servers when you use our services, or transferred or shared to us as part of a request for technical support or other services.

Our applications only process PII that is required to provide our services. All the information entrusted to OES Group is collectively termed "service data"

### What we do with your information

We use your information to provide the services you've requested, create and maintain your accounts, and keep an eye out for unauthorized activity on your accounts. We also use it to communicate with you about the products you're currently using, your customer support requests, OES Group Privacy Statement version December 2018 3 new products you may like, chances for you to give us feedback, and policy updates. We analyze the information we collect to understand user needs and to improve our websites and services.

You can decline certain kinds of information use either by not providing the information in the first place or by opting out later. You can also disable cookies to prevent your browser from giving us information, but if you do so, certain website features may not work properly.

We limit access to your personal information to our employees and contractors who have a legitimate need to use it. If we share your information with other parties (like developers, service providers, domain registrars, and reselling partners), they must have appropriate security measures and a valid reason for using your information, typically to serve you.

We keep your personal information for as long as it is required for the purposes stated in this Privacy Policy. When we no longer have a legitimate need to process your information, we will delete, anonymize, or isolate your information, whichever is appropriate.

### Information that OES Group processes on your behalf

If you handle other people's data using OES Group apps, such as information about your customers, prospects or employees, you are entrusting that data to us for processing. If you use an OES Group mobile app and give the app access to your contacts and photo library, you are entrusting data to us. The data you entrust to us for processing is called service data. You own your service data.

We protect it, limit access to it, and only process it according to your instructions. You may access it, share it through third-party integrations, and request that we export or delete it.

We hold the data in your account as long as you choose to use OES Group Services. After you terminate your account, your data will be automatically deleted from our active database within 6 months and from our backups within 3 months after that.

If you are in the European Economic Area and you believe that someone has entrusted your information to us for processing (for instance, your employer or a company whose services you use), you can request certain actions from us regarding your data. To exercise those data rights, please contact the person or company that entrusted the data to us and we will work with them on your request.

### The legal grounds we have to use your personal information

OES Group generally collects only the personal information necessary to fulfil your request. Where additional, optional information is sought, you will be notified of this at the point of collection. The law in Europe allows us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

**Performance of a contract:** this is when the processing of your personal information is necessary in order to perform our obligations under a contract; OES Group Privacy Statement version December 2018 4

**Legal obligation:** this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency; or

Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting OES Group at [sales@oesgrouppltd.com](mailto:sales@oesgrouppltd.com).

### Automatic collection of personal information

In some instances, OES Group and its service providers use cookies and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of OES Group online presence, and to measure the effectiveness of our marketing activities.

### Cookies

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our websites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our websites' features.

Further information about managing cookies can be found in your browser's help file or through sites such as [www.allaboutcookies.org](http://www.allaboutcookies.org).

By navigating on our web sites or entering your login details to access areas reserved for registered users, you agree that we can place these cookies on your computer or internet enabled device.

### Google Analytics

OES Group uses Google Analytics. More information about how Google Analytics is used by OES Group can be found here: <http://www.google.com/analytics/learn/privacy.html>

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information

about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

## Children

OES Group understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

## Sharing and transfer of personal information

**OES Group and third party sub-processors:** In order to provide services and technical support for our products, the contracting entity within OES Group engages other group entities and third parties.

**Employees and independent contractors:** We may provide access to your service data to our employees and individuals who are independent contractors of the OES Group entities involved in providing the services (collectively our “employees”) so that they can (i) identify, analyze and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals, and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the OES Group.

**Collaborators and other users:** Some of our products or services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all of your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.

OES Group does not transfer any personal information outside of the EEA. OES Group will not transfer the personal information you provide to any third parties for their own direct marketing use.

## Choices

In general, you are not required to submit any PII to OES Group online, but we may require you to provide certain PII in order for you to receive additional information about our services and events. OES Group may also ask for your permission for certain uses of your PII, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will remove your information promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our sites may not work properly if you elect to refuse cookies.

## Your rights

If OES Group processes personal information about you, you have the following rights:

**Access and correction:** you have the right to access to that data. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information.

**Object to processing:** you have the right to object to us processing your personal information if we are not entitled to use it any more.

**Other rights:** in addition, you may have rights to have your information deleted if we are keeping it too long, have its processing restricted in certain circumstances and/or to obtain copies of information we hold about you in electronic form.

You can make a request or exercise these rights by contacting OES Group at [sales@oesgrouppltd.com](mailto:sales@oesgrouppltd.com) and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

## Data security and integrity

OES Group has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite OES Group's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long i) as the information is necessary to comply with an individual's request, ii) as necessary to comply with legal, regulatory, internal business or policy requirements, or iii) until that person asks that the information be deleted. The period for which data is retained will depend on the specific nature and circumstances under which the information was collected; however, subject to requirements of i)-iii) above, personal information will not be retained for more than 2 years.

## Changes to this statement

OES Group may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date

at the top of this page. Any changes to the processing of personal information as described in this Privacy Statement affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

#### Policy questions and enforcement

OES Group is committed to protecting your personal information. If you have questions or comments about our administration of your personal information, please contact us at [sales@oesgrouppltd.com](mailto:sales@oesgrouppltd.com).

You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement. If you have any question about this privacy policy, please contact OES Group at:

Company: OES Group Ltd.

Address: Unit 12, 6 Amos Ayre Place, Simonside Industrial Estate, South Shields, NE34 9PE, The United Kingdom

E-mail: [Sales@oesgrouppltd.com](mailto:Sales@oesgrouppltd.com)

If you contact us about this privacy statement, we will acknowledge your email within 14 days and seek to resolve your concern within one month of receipt. Where the concern is complex or we have a large volume of concerns, we will notify you that the concern will take longer than one month to resolve, and we will seek to resolve your concern within three months of the concern being first raised. We may accept your concern (and in that case implement one of the measures set out in the 'Your Rights' section above), or we may reject your concern on legitimate grounds. In any event, you always have the right to lodge a complaint with the English regulator in charge of protecting personal information.