

# Apex BI Limited – Privacy Policy

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**We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.**

## Introduction

Welcome to our privacy policy. We are Apex BI (Registration number 2015/352200/07) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

**The purpose of this policy is to describe the way that we handle your personal information.**

## Audience

This policy applies to you if you are:

- a visitor to our online portal; or
- a customer who has ordered or requested the goods or services that we provide.

**This policy applies to you under certain circumstances.**

## Personal information

Personal information includes:

- certain information that we collect automatically when you visit our online portal;
- certain information collected during onboarding (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

**Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.**

## Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name;
- **contact information** – such as your phone number or email address;

## Sensitive personal information

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- **financial information (juristic entity like a company)** – such as your bank account details;

## Acceptance

### Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

**You may not order our goods or request our services if you do not accept this policy.**

### Legal capacity

You may not access our online portal or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

### Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

### Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

## Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

## Collection

### During onboarding

Once you are onboarded, you will no longer be anonymous to us. You will provide us with certain personal information when you become a customer.

This personal information will include:

- your name and surname;
- your email address;

- your telephone number;
- your company name, company registration number, and VAT number;
- your postal address or street address; and
- your username and password.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

**We collect certain information on registration, when you register on our website.**

#### **On order or request**

When you order our goods or request our services from us, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

**We collect certain information when you order our goods or request our services from us.**

#### **From browser**

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**).

**We collect certain information from your web browser, including your Internet usage information when you visit our website.**

#### **Cookies**

For information on how we deal with cookies, please refer to our Cookies Policy.

#### **Web beacons**

Our online portal may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our online portal.

**We collect certain information from web beacons on our website to compile anonymous information about our website.**

#### **Optional details**

You may also provide additional information to us on a voluntary basis (**optional information**). This includes content or products that you decide to upload or download from our online portal or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our online portal.

#### **Downloading copying, extracting data**

Please be aware that once you have downloaded/extracted/copied data from our online portal Apex BI are no longer responsible for its safekeeping and this responsibility will fall to you.

**We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional goods or services.**

### **Recording calls**

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

### **Purpose for collection**

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the online portal;
- monitor online portal usage metrics such as total number of visits and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the online portal.

**We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.**

### **Consent to collection**

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

**We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.**

## **Use**

### **Our obligations**

We may use your personal information to fulfil our obligations to you.

### **Messages and updates**

We may send administrative messages and email updates to you about the online portal. We may wish to provide you with information about new goods or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will not send you

promotional messages unless you have chosen to opt-into them. But, we may send you one message asking you to opt-into promotional messages without you having opted-into promotional messages.

**We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.**

### **Targeted content**

While you are logged into the online portal, we may display other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so.

**We may use your information for targeted content in certain, specified instances.**

## **Disclosure**

### **Sharing**

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications;
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- other third parties who provide us with relevant services where appropriate.

**We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.**

### **Regulators**

We may disclose your personal information as required by law or governmental audit.

### **Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

**We may disclose personal information to third parties if required for legal reasons.**

### **No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

## Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to business partners.

## Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

## Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our online portal in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

**Our website is hosted on a secure server and uses security measures to prevent interference by intruders.**

## Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information or that of users you are responsible for on the online portal. You are able to review or update any personal information that we hold on you by emailing us or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before making any corrections to personal information.

**Please keep your personal information accurate and up to date by accessing your account online, emailing us, by phoning us.**

## Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

**We will only retain your personal information for as long as is necessary.**

## **Transfer to another country**

We will not transfer any personal information across a country border without your prior written consent.

**We will not transfer your personal information outside the country in which it was collected to a foreign country without your permission.**

## **Updating or removing**

You may choose to correct or update the personal information you have submitted to us, by contacting us by phone or email.

**You may choose to update or remove the personal information you have submitted to us.**

## **Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

## **Enquiries**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.