

# Policy: SASSHA Software Privacy Policy

# Reviewed: March 2020

At SASSHA Software, we put our priority on protecting you and your customer's personal information. Acknowledging the importance of personal information, we strive to secure and carefully process the information you share with us. We value your trust. We provide notice regarding how we collect, use and share your information. Our collection, use and sharing of your information is only based on your permission or where allowed by law.

At SASSHA Software, we help safeguard your data through technical data security and internal management procedures, as well as physical data protection measures. We strive to offer inspiring and fascinating digital experiences. In order to do so, your trust is paramount and so we take measures to protect your personal information.

SASSHA Software and our Affiliates ("SASSHA," "we," "us," "our") know how important privacy is to our customers, and we strive to be clear about how we collect, use, disclose, transfer and store your information. This Privacy Policy provides an overview of our information practices. The Privacy Policy applies to SASSHA Products, Services, websites or online applications that refer to or link to the Privacy Policy (collectively, our "Services").

Please note that the Privacy Policy applies to your usage of SASSHA products (which are among the Services covered by this Privacy Policy, along with our services, websites and online applications). It also applies regardless of whether you use a computer, mobile phone, tablet, TV, or other device to access our Services. It is important that you read the Privacy Policy carefully because anytime you use our Services, you consent to the practices we describe in the Privacy Policy and the supplements. If you do not agree to the practices described in the Privacy Policy, you should not use our Services.

It also is important that you check back often for updates to the Privacy Policy. If we update the Privacy Policy, we will let you know about changes we consider to be material by placing a note on relevant Services. By accessing or using our Services after we have placed such a notice, you consent to the new practice(s) identified in the update.

Thank you for your continued interest and support.

# What information do we collect about you?

# Information you provide directly

Some Services enable you to give us information directly. For example:

- A number of our Services enable users to create accounts. In connection with these Services, we may ask you to provide certain information about yourself to set up the account. For example, you can submit certain information about yourself, such as your name and email address, when you create a SASSHA Account.
- If you order a product or service from us, we may ask for your name, contact information and billing address(es) in order to process your order.



• Some of our Services enable you to communicate with other people. Those communications may be transmitted through and stored on your systems.

## Information about your use of the Services

In addition to the information you provide, we may collect information about your use of our Services through software on your device and other means. For example, we may collect:

- **Device information** such as your hardware model, MAC address, IP address, operating system version, and settings of the device you use to access the Services.
- Log information such as the time and duration of your use of the Service, and any information stored in cookies that we have set on your device.
- Location information such as your device's GPS signal
- Other information about your use of the Services, such as the apps you use.

#### Other Information We Collect

We also may collect other information about you, your device, or your use of the services in ways that we describe to you at the point of collection or otherwise with your consent.

You can choose not to provide us with certain types of information (e.g., information we request during SASSHA Account registration), but doing so may affect your ability to use some Services.

#### How do we use your information?

#### We may use information we collect for the following purposes:

- to register you or your device for a Service;
- to provide a Service or feature you request, including to enable us to fulfil our obligations under any contract with you;
  - for assessment and analysis of our market, customers, products, and services (including asking you for your opinions on our products and services and carrying out customer surveys);
  - to understand the way people use our Services so that we can improve them and develop new products and services;
  - to provide maintenance services for your device;
  - for the prevention or detection of fraud or crime;
  - for business monitoring and internal record keeping;
  - to comply with our legal obligations;
  - otherwise with your consent.

#### Direct marketing

We may use information about you, which we hold in order to provide you with information about products or services, promotions, special offers and other information, which relates to our products or services or which we believe may be of interest to you.

When you provide us with information about yourself, you will usually be given the option to let us know that you do not want that information to be used for direct marketing purposes. We will only



use that information for the purpose of direct marketing in accordance with your preferences (or where we are otherwise permitted to do so by law).

Where your consent is required, we will usually ask for it by asking to you tick an "opt-in" box. The "opt-in" box may or may not be split between different classes of information or different means of marketing.

By 'preferences' we mean whether or not you have "opted in" and as such whether we can or cannot send direct marketing to you.

We may send you such information by:

- email;
- telephone;
- post;
- smartphone applications;
- social networking websites;
- or any other method which becomes relevant from time to time.

You can change your mind about your preferences (as defined above) in respect of direct marketing by contacting <u>support@sassha.co.uk</u>. You can do this at any time. In addition, if you receive direct marketing from us by email, you will be reminded in the email that you are free to request a change to your preferences. If you do change your mind about your preferences, we would not remove your Personal Data from our data base(s) but we would note your changed preferences and would cease using your information for the purpose of direct marketing as soon as reasonably possible.

## To whom do we disclose your information

We will not disclose your information to third parties for their own independent marketing or business purposes without your consent. However, we may disclose your information to the following entities:

- Affiliates Your information may be shared among SASSHA Affiliates.
- **Business Partners** We also may share your information with trusted business partners. These entities may use your information to provide you with services you request
- Service providers We also may disclose your information to companies that provide services for or on behalf of us. These entities are limited in their ability to use your information for purposes other than providing services for us.
- Other Parties When Required by Law or as Necessary to Protect Our Services. There may be instances when we disclose your information to other parties:
  - - to comply with the law or respond to compulsory legal process (such as a search warrant or other court order);
  - - to verify or enforce compliance with the policies governing our Services; and
  - - to protect the rights, property, or safety of SASSHA-, or any of our respective affiliates, business partners, or customers.
- Other Parties in Connection with Corporate Transactions. We may disclose your information to a third party as part of a merger or transfer, or in the event of a bankruptcy.
- Other Parties with Your Consent or At Your Direction. In addition to the disclosures described in this Privacy Policy, we may share information about you with third parties when you consent to or request such sharing.



#### How do we keep your information secure?

We have put in place reasonable physical and technical measures to safeguard the information we collect in connection with the Services. However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system or wireless connection is completely secure.

#### Accessing Your Information

Under UK data protection law, you have the right to request details of Personal Data which we hold about you. We will comply with your request promptly and by no later than 1 month from receipt of any such request. There will be no fee for dealing with your request, unless the request is manifestly unfounded or excessive.

Please help us to ensure that the information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please email support@sassha.co.uk, in the manner set out above. We will correct or update any information about you as soon as reasonably possible.

#### **Data Retention**

We take reasonable steps to ensure that we retain information about you only for so long as is necessary for the purpose for which it was collected, or as required under any contract or by applicable law.

#### Your Choices

You can make choices about whether to receive promotional communications from us by following the unsubscribe instructions included in the communication or by adjusting the privacy settings on the relevant device. You can make a variety of choices about how your information is used.

#### Review Due: March 2021