

Finvisage - Privacy Policy

Privacy Policy

Effective date: 21 April 2020

We are committed to our relationship with you and your privacy is very important to us. We want to be sure you understand the steps we have taken to protect your information such as collection, use and disclosure of Personal Information we receive from users of this Site. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation (GDPR), which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. This policy is intended to help you understand:

Quick Links:

Please read the full Privacy Policy to ensure that you are fully informed. However, if you wish to read only a particular section of this Privacy notice, please click on the relevant section to navigate to that section

❑ Who we are -

We meaning - **Apex Financial Technology Limited** ("us", "we", "our" or "Finvisage") operates our cloud-based SaaS solution called **Finvisage**. For more information about us, please see the "About" section of our Website at <https://www.finvisage.com/about-finvisage/>. We follow the EUs GDPR Data Privacy Regulations in all respects to protect the privacy of our customers and users.

❑ What information we collect about you -

The information that we collect from you depends on what Services you use, how you use the Services, and what information you choose to provide or make available to us. We may also have to collect information about you when you input it into the Services or in cases when you have to provide it directly to us.

- **Account Information:** We collect information about you when you create or register your account, input information or data into any of our Services, or post or upload permitted content to our Services, submit questions, requests, any other sort of communications to us via contact us forms, email, other communication media, contact us for any technical support, visit our website, participate in any surveys, demonstrations, or other events if any.
- **Customer Information:** Customer Information here is the information collected upon the creation of accounts or that otherwise identifies you as a customer or end-user of our Services. It may include personal information such as your name, email address, gender, location data, professional online presence e.g. LinkedIn, postal address and phone number. It may also include payment information, such as payment method, credit card information, and any other contact information (such as name and postal address) associated with payment billing information.

- **Content you provide through our products:** We collect and store content that you post, send, receive and share while using our products. This content includes any information about you that you may choose to include such as any feedback that you may want to provide us.
- **Content you provide through our website:** The Services also include our website owned or operated by us. We collect other content that you submit to these websites, which includes social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.
- **Information provided through our support services:** This includes our customer support services, where you may choose to share or submit information regarding a problem that you may be facing with a Service. You may be asked to provide contact information, a summary of your problem you are facing, and any other relevant information as deemed relevant by the Support Team that would be helpful in resolving the issue. You also give your consent to us to record any calls made by You seeking support services via telephone that may be further used by us for our internal quality training and testing purposes and provide better services to you.
- **Payment Information:** When you register for our paid Services we collect billing and payment-related information. For example, we ask you to provide us with the name and contact information of the billing representative upon registration. We also ask for payment information, such as payment card details, which we collect via secure payment processing services.
- **Information collected automatically when you use the Services:** When you use our Services we collect information about how you use the Services, your actions on the Services including IP addresses, what software and hardware you use such as browser types, operating systems, internet service providers (ISPs), URLs of referring/exit pages, platform type, device type, mobile device identifiers, mobile carrier, features of Finvisage product used, and related dates and time stamps, search items, search terms, links clicked, and other statistics related to your usage of Services. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. We also gather this information to learn how our users, customers, and the public are consuming our content and using our Services. How much of this information we collect depends on the type and settings of the device you use to access the Services. We may also use tools, including third-party tools, to collect analytics data. Some of this information is collected through the use of "cookies". We may also work with third-party partners to employ tracking technologies.
- **Information we receive from other sources:** Information about you will also be gathered from other Service users, from third-party services, social media platforms, public databases, from our related companies and from our other business and channel partners. We may combine this information with information we collect through other means described above. This helps us to update and improve our records, identify new customers, create more personalised advertising and suggest services that may be of interest to you.
- **Third party providers:** Information about you may also be received from third party providers of business information and publicly available sources such as the social media platforms, professional networking sites which may also include physical mail addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), and social media profiles, for the purposes of targeted advertising of products that may interest you, delivering personalised communications, event promotion, and profiling.
- **Finvisage partners:** We may also work with a global network of partners who provide consulting, implementation, training and other services around our product. Some of these partners may also assist us in marketing and promoting our services, generating leads for us, and resell our Service to a wide range of customers all over.
- **Other users of the Services:** There may be instances when other users of our Services may provide information about you when they submit content through Services. An example such as - you may have been mentioned in an issue opened by someone else in your team, a team member may

upload content about you or assign to be discussed. In case any other Service user invites you to the Services and here we may have to collect your email address and other information required. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account or when they designate you as an administrator.

□ **How we use the information we collect from you -**

We use the information we collect for a variety of purposes such as which Services or features of the Services you use, how you use them, if or any preferences have been communicated to us. Below are the purposes for which we use the information we collect and we have tried our best to include all the points that cover how we use the information collected from you and if any points that are missed out you can be assured that they would be used only for the purpose of improving the quality of the Services.

- To provide technical assistance or customer support to you
- To respond to your queries, requests or any other information requested by you
- To contact you to update the product upgrades, information about products that you have signed up and informing about other Finvisage products, services and features that may probably be of interest to you and to monitor the performance of our marketing efforts.
- Creating, training, and administering your information and account, including identifying you with your account.
- Billing and other payment-related information for products purchased from us
- To communicate with you about your account and informing you about any changes in the policy
- To verify and maintain the quality of the Services used by you
- We use your information to derive market insights, ways to improve our Services, business analysis, for other research and development purposes to make sure we provide you with smarter, faster, secure and also to obtain collective learnings (including feedback) about how people use our Services to troubleshoot, to identify trends, usage, activity patterns for better Services to users.
- To communicate with you about the Services or features in the product that may be newly added by using your contact information to send transactional communications via email, including confirming your sign-ups, purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.
- To market, promote and drive engagement within the Services
- Securing the Services and our systems, and protecting your information and data
- Customising existing and future product offerings and other aspects of the Services to you and other users
- To verify your identity and prevent fraud
- Enforcing our terms and policies
- Detecting security incidents, protecting against any possible malicious, deceptive, fraudulent or illegal activity, including violations of Service policies
- Developing new products and services
- To ensure internal quality control to provide best services to you and users of our products.
- Auditing relating to interactions, transactions and other compliance activities
- To share customised materials about our products, offers, and other services that may be of interest, value add to your business, including new content.
- Other purposes you consent to, are notified of, or are disclosed when you provide personal information
- To protect our legitimate business interests and legal rights where required by law or where we identify it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

- We may use your information for any other business purpose that does not conflict with the statements made in the privacy policy
- We may use your information with your consent to do so for a specific purpose. Say for example, To publish testimonials or featured customer stories to promote our products with your consent.

❑ **How we may share your information we collect -**

Except as provided below we do not share, disclose, sell or rent your personal information to any advertisers or third parties without your permission, however, we may store your information or data on servers provided by third party hosting vendors or service providers with whom we have contractual agreements. We will not share personal information about you to third parties for their independent use unless otherwise you specifically authorise Finvisage to do so.

- If it is required to do so to share any information about you by law, regulation or any legal process that may be involved such as the court order etc.,
- If disclosure is necessary to prevent physical, financial, or any other loss, injury or harm in connection with an investigation of suspected or actual illegal activity
- Any requests received from government agencies, such as law enforcements or other national security agencies
- The information that we collect is shared in accordance with our legitimate interests and business purposes.
- We may share your contact information with our channel partners, subsidiaries, affiliates, for business purposes
- We may share your information we collect with service providers such as payment processing, website hosting, technical support and marketing or promotional services.
- We also reserve the right to transfer personal information in the event it sells or transfers all or a portion of its business or assets, or merges with another entity, in such a case Finvisage will use appropriate measures to direct the transferee to use the personal information in a manner that is consistent with this policy. You will be notified via email and/or a prominent notice on the Services if any such transaction takes place, as well as any choices you may have regarding your information.
- As necessary to comply with applicable law, including governmental requests, law enforcement requests, and otherwise to protect the rights, privacy, business, safety, or property of you, us, or the public.
- In certain situations we may share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

❑ **How long your personal information will be kept / Data Retention -**

- We retain the personal information that we collect from you as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. It may also be retained as necessary to fulfill the purposes for which it was collected for providing our services, to continue to develop and improve our services, to resolve disputes if any, establish any legal defense, enforce our agreements or to comply with any applicable laws, for legal audit purposes. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

❑ **How do we secure your information -**

- We are an ISO 27001 certified company, which means we follow top industry standards for information security. We take every appropriate administrative, technical and organisational security measures to safeguard your personal information from loss, theft, unauthorised access and misuse. Nevertheless, no security measures are 100% fool proof and transmission via the internet is not completely secure and we cannot guarantee the security of information about you. Please feel free to write to us at privacy@apexft.com for any questions that you may have about the security of your personal information.

❑ **Third party links -**

- Occasionally we may provide links to a variety of third party social media sites or professional networking sites as a service to you or to provide additional information related to our services that may be of interest to you. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we always seek measures to protect the integrity of our site and welcome any feedback about these sites.

❑ **Transferring your personal information out of the EEA -**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), in cases when we have /may have our offices outside the EEA, with your and our service providers located outside the EEA, if you are based outside the EEA, in cases where there is an international dimension to the services we are providing to you

These data transfers are subject to special rules under European and UK data protection law.

Non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

❑ **Data Subject Rights -**

You have the following rights, which you can exercise free of charge.

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten / Deletion	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or

	transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights under the General Data Protection Regulation](#).

Please note that we retain information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

If you have any issues with our compliance, you may contact our Data Protection Officer at privacy@apexft.com. You also have the right to lodge a complaint with the data protection regulator in your jurisdiction.

❏ **Changes to our Privacy Policy -**

- We may change this privacy policy from time to time. We will post any privacy policy changes on this page and/or update the Privacy Notice modification date at the top of this Notice. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

❏ **How to contact us -**

- If there are any questions regarding this Privacy Notice or your privacy rights you may contact us at privacy@apexft.com
- The Data Controller of your personal data is Apex Financial Technology Ltd, 128 City Road, London EC1V 2NX, United Kingdom. For details regarding other Data Controllers in our group, please see <https://www.finvisage.com/contact-finvisage/>