

Privacy Policy - October 2018

Inspirisys Solutions Group Privacy Policy

Inspirisys Solutions is an IT service provider that provides a range of IT services. These services include infrastructure services, managed services such as infrastructure support, cloud and mobility services, software development services, product engineering services, IoT services and security services. Inspirisys Solutions is fully committed to ensuring the proper, open, and transparent management and use of all personal information and/or data it collects and handles complies with applicable privacy laws. **This privacy policy applies only to external personal information and/or data provided by clients, suppliers and other external third parties that Inspirisys Solutions interacts with.**

This Privacy Policy (Policy) applies to all of Inspirisys Solutions's entities and its affiliated entities in countries in which Inspirisys Solutions operates and subject to the applicable privacy laws in the jurisdiction where the entity operates (refer to www.Inspirisys.com for our locations). It sets out Inspirisys Solutions's policy on the management of personal information and/or data that it may receive or collect.

Personal information and personal data for the purpose of this Policy is defined as "any sort of information or an opinion about an individual, whether true or not", and includes all personal data about an individual, or which can be used to identify an individual either directly or indirectly (referred to collectively as "**Personal Information**").

A sub-category of Personal Information is **sensitive information** and data. For the purposes of this Policy, sensitive information and data includes information of a particularly sensitive nature, such as information relating to an individual's health, racial or ethnic origins, political opinions, membership of a trade union or political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences or criminal record.

1. WHAT PERSONAL INFORMATION DOES INSPIRISYS SOLUTIONS COLLECT, FROM WHOM AND FOR WHAT PURPOSE?

Inspirisys Solutions will only collect Personal Information that is necessary for its functions and activities. It will only collect Personal Information by fair and lawful means. Inspirisys Solutions may collect and process personal information through a variety of means, including, as examples, access to Inspirisys Solutions sites or services, employment processes, or correspondence with Inspirisys Solutions representatives, through purchase of goods or services or in the course of online services. Inspirisys Solutions collects and holds different categories of information depending on the services being provided and the jurisdiction in which those services are being provided. The following types of Personal Information may be collected:

a) Information about Inspirisys Solutions's Contractors and Suppliers

Inspirisys Solutions collects, directly from our contractors and suppliers, Personal Information about them. This Personal Information includes their name and contact details which allows them to be contacted. For workplace health and safety reasons we may also collect from contractors, certain "sensitive information" with consent; for example, medical information a contractor has provided us about any injuries he or she may currently suffer.

From third parties, we may also collect feedback and information relating to our contractors and suppliers' performance of services for Inspirisys Solutions. This information is collected for the purposes of monitoring our contractors and suppliers' performance of services and to ensure that we are able to provide the highest quality products and services to our customers.

b) Information about job applicants

Applicants for a position at Inspirisys Solutions will be asked to supply details relevant to the job application such as name, contact details, information contained in CVs, driver's license or passport. We may also collect from third parties identified as referees Personal Information relating to the applicant. This information is used for the purposes of determining suitability for the vacant role.

c) Information about customers and their employees and customers

Personal Information may be collected from customers such as name, contact details, bank account and credit card details.

All personal Information of the customers collected by Inspirisys Solutions is used for our business functions and activities. These include:

- for billing purposes and order fulfilment;
- to contact customers about our provision of services;
- to maintain account details;
- to provide technical support e.g. account creation, password reset;
- to provide information on request about our products and services;
- to streamline and personalise customer experience while dealing with Inspirisys Solutions;
- to undertake customer satisfaction surveys and to tailor Inspirisys Solutions information, services or products in order to improve and enhance those services and products provided to our customers.

Inspirisys Solutions may also collect from its customers Personal Information relating to its employees and customers; for example, payroll information. This Personal Information is used so that we can facilitate the provision of the services our customers have requested.

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2. QUALITY OF PERSONAL INFORMATION

Inspirisys Solutions will ensure, to the extent reasonably possible, that personal information collected, used or disclosed is accurate, up-to-date, complete and relevant. If Inspirisys Solutions becomes aware that any of the personal information it holds is inaccurate, it will take prompt steps to update its records so that those records are correct.

3. DATA SECURITY

Inspirisys Solutions takes active measures to ensure the security of Personal Information it holds is protected from misuse, interference, loss and unauthorized access, modification or disclosure.

All Inspirisys Solutions ICT devices, storage and channels are subject to continuous monitoring, logging analysis and audit. Inspirisys Solutions may choose to contract a third party to perform those functions.

All Personal Information is stored at secure premises using good quality security protocols.

Inspirisys Solutions security systems are regularly reviewed and updated to maintain the integrity of the Inspirisys Solutions security posture.

4. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Subject to verification of identity, any Personal Information held about an individual may be accessed, updated or corrected by application to Inspirisys Solutions by sending an email to reachus@inspirisys.com with the subject line "Privacy Policy Inspirisys Solutions Solutions Limited."

There is generally no fee for an individual to make a request or to be provided access to his or her Personal Information. However, depending on the complexity of the request a reasonable processing fee may be charged in some cases.

Inspirisys Solutions will endeavour to respond to access and correction of Personal Information within 15 business days after a written request is received by a Inspirisys Solutions Privacy Officer.

5. DIRECT MARKETING

Inspirisys Solutions will only engage in direct marketing practices in accordance with the laws of the relevant country or jurisdiction. At any time an individual or organization may contact Inspirisys Solutions to request that they no longer receive any marketing material or information from Inspirisys Solutions.

If you feel at any stage we have incorrectly used your Personal Information for direct marketing, please contact us immediately at reachus@inspirisys.com with subject line "Privacy Policy Inspirisys Solutions."

6. DISCLOSURE AND RETENTION OF PERSONAL INFORMATION

As part of providing services to a customer, Inspirisys Solutions may disclose Personal Information to third party suppliers and contractors of services or retain and disclose Personal Information as authorized by law for example metadata.

Inspirisys Solutions may disclose some Personal Information to its affiliated entities in countries in which Inspirisys Solutions operates for the purposes of providing services to our customers, including technical support.

Such disclosure is subject to the privacy laws applicable in the jurisdiction where that affiliated, entity is located. A formal intragroup agreement is in place to ensure all Personal Information is properly protected at all times for transfers within the Inspirisys Solutions global group.

Inspirisys Solutions only retains Personal Information for as long as required by applicable law or as needed for our business functions and activities. If Personal Information is no longer needed, it is then destroyed or disposed of in a secure manner.

7. INTERNATIONAL DATA TRANSFERS

As a provider and user of IT services, including cloud services, Inspirisys Solutions retains Personal Information on servers that may be located in a number of overseas countries.

Inspirisys Solutions recognises and respects the varying national laws and obligations and their impact on cross-border data transfers when transferring or processing Personal Information outside of the country of collection for the purposes identified above. Inspirisys Solutions will take all reasonable steps to ensure that no person or entity, breaches any relevant privacy and data protection laws using a variety of lawful data transfer mechanisms and contractual agreements for privacy and data protection.

8. WEBSITE BROWSING

Accessing Inspirisys Solutions's websites will result in some information being logged including the time of access, IP address and the pages that have been viewed or accessed.

Inspirisys Solutions's websites may contain links to external websites. Inspirisys Solutions is not responsible for the content or privacy policies that govern such external websites.

9. PRIVACY ISSUES

Inspirisys Solutions has legal obligations under privacy legislation to hold information securely and to use it appropriately in accordance with our privacy policy. If you feel we have breached these obligations, or have any questions about this Policy, or to raise any issues about privacy or data protection within Inspirisys Solutions please contact Inspirisys Solutions at:

Email: reachus@inspirisys.com with subject line "Privacy Policy Inspirisys Solutions."

Due to the nature of the services that Inspirisys Solutions provides, in most situations it will be impracticable for an individual to deal with us on an anonymous basis. However, Inspirisys Solutions will consider anonymous requests on a case by case basis.

If you are not satisfied with Inspirisys Solutions's response and the issue relates to a privacy concern or alleged breach by Inspirisys Solutions, you may take your complaint to the relevant government authority responsible for privacy and data protection.