PRIVACY POLICY OF THESAURUS SOFTWARE LIMITED

This document sets out how we handle your data. At Thesaurus Software Ltd., we are committed to protecting your privacy. Please read on for more details on our Privacy Policy. This Privacy Policies covers all products and services under the Thesaurus Software Ltd. group.

Please note that this policy does not apply to any company or person outside Thesaurus Software Ltd.

A. PERSONAL DATA COLLECTED

You may submit your information to us for a number of reasons:

- When you purchase a product or register to use our software: this may include your name, business name, address, email, telephone number, IP address and payment details,
- When you contact us with a support query: this will primarily include your name and contact details and in some cases a copy of your backup file,
- When you request a demo of our software, attend a webinar, sign up to our mailing list, submit an online query, download our software or complete any surveys, provide testimonials or enter into any competitions: details gathered may include your name, business name, address, email and telephone number,
- When you apply for a job posting; this may include your curriculum vitae, details
 of qualifications and experience or any other application forms completed.

We will not process special categories of personal data such as race, ethnicity, religious or political opinion.

Should you give us personal data about someone else, you are responsible for ensuring that you comply with all data protection laws. In advance of submitting any information to us you should have notified them that data is shared and clarify how we collect, use and retain their personal information.

B. HOW WE USE YOUR DATA

We undertake to design our systems and products in such a way as to minimise the use of personal data. Where data is required, the purpose for which you are invited to give us information is clear. We will not use your information for purposes that are not clear when you provide your details. Should we intend to use your data for any other purpose, we will not do so without first notifying you in writing.

We use your information to:

- process your payment,
- meet the requirements of the contract,
- provide information and services that you have requested,
- provide software support to you and mange our relationship with you,
- monitor, measure, improve and protect our products and services,
- manage software usage and ensure compliance with the terms of our contract,
- comply with regulatory requirements,
- request your participation in any customer research, for example when we
 research possible new products / features or feedback on existing products or
 services. Where testimonials or feedback have been provided, this information
 may be used in marketing material in an anonymous format, only with specific
 agreement from you will your details be associated with any comments,
- assist in our sales cycle and the onboarding of new customers,
- Market new products, features or services only where you have specifically opted-in to receive marketing emails.

We do not employ automated decision making methods in relation to any of your personal data stored.

Software Users' information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Where you have requested a software demo, made an online enquiry or attended a webinar your details will generally be stored by us for 24 months, but no more than 36 months. This is to accommodate the normal sales-cycle of our customers, to allow us monitor webinar demands and interest levels in products and services.

Your information we use for marketing purposes will be kept with us until you notify us that you no longer wish to receive this information.

To ensure continuity and transparency in our recruitment campaigns, all applicant details will be kept for no longer than 14 months after the end of the recruitment process.

If you withdraw your consent or opt not to provide requested personal information for the purposes set out in our Privacy Policy, we may not be able to provide you with access to the requested product or service.

C. EMAILS FROM US

We will send users email notifications regarding purchases (such as invoices and renewal notifications) as well as emails relating to essential software maintenance, including product upgrades and releases.

Only if you have specifically requested will we contact you with additional information such as free webinars, CPD events, special offers and newsletters from our group companies. We may wish to contact you for this purpose by telephone, post, SMS or email. You have the ability to unsubscribe from opted-in communications at any time. Alternatively, you can let us know your preferences by:

Email: marketing@thesaurussoftware.com

Phone: 01 8352074

Post: Thesaurus Software, Dublin Road, Ashbourne, Co. Meath.

D. DISCLOSURE AND SHARING OF YOUR DATA

In the following circumstances, we may send your personally identifiable information to others.

- We have obtained your express consent to share the information.
- We need to share your information to provide the service or product you have requested, paid or unpaid.
- We need to send the information to others who work on behalf of Thesaurus Software Ltd to provide a service or product to you.
- We find that your actions violate the terms of our Terms of Service or any of our usage guidelines.
- Our company is subject to a take-over or merger in which case the information will be disclosed to the new owners on the understanding that they will protect the information and only use the information in substantially the same way as previously.
- We must respond to court orders and any other legitimate request by authorities with which we must comply.
- We undertake not to sell, trade, or rent any personally identifiable information to others.

Internally, we limit access to personal information about you to those Thesaurus Software Ltd. employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their job.

1. THIRD PARTY SERVICE PROVIDERS

In providing you with the product or service you request, we may occasionally use third party companies to manage collation, processing and storage of your personal information on our behalf. These companies are carefully selected and screened to ensure maximum protection of your security and privacy and are permitted to use the information only in accordance with our instructions.

These third party providers are not permitted to further transfer your personal data nor are they permitted to use your personal data for their own business purposes.

2. INTERNATIONAL DATA TRANSFERS

Where possible, we only process your information within the European Economic Area (EEA). However, some of the service providers referred to above may be based outside of the EEA.

We take steps to ensure that where your information is transferred outside of the EEA to our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations.

E. MEASURING OUR VISITORS

We measure visitors to our website using Google Analytics. This records what pages you view on our site, how you arrived at our site and some basic information about your computer. All of that information is anonymous. We don't know who you are – just that *somebody* visited our site.

The information we collect from analytics helps us understand what parts of our website are doing well, how people arrive at our site, and so on. Like most websites, we use this information to make our website better.

You can learn more about Google Analytics or opt out if you wish.

F. COOKIES

Cookies are small text files that are placed on your computer by websites you visit. Cookies help make this website work and provide information to us about how users interact with our site. We use this information to improve our website.

By using our website, you agree that we can place these types of cookies on your device.

Full details of the cookies we use and what they do can be found in our Cookie Policy.

G. PAYMENT

We use a variety of providers to process payments. These companies will have access to your personal and payment information. The third parties we use are Realex (to process credit cards) and AIB Merchant Services.

We share information with these companies only to the extent necessary for the purposes of processing payments you make via our website. Thesaurus Software Ltd. has carried out due diligence on the privacy policies of both Realex and AIB Merchant Services, to the best of our knowledge they are fully compliant with Data Protection legislation. Click on the hyperlinks above to review the relevant Privacy Clause.

Thesaurus Software Ltd. is fully PCI compliant.

H. DATA FILES

Thesaurus Software Ltd. does not have access to your data files, except where they have been submitted for support reasons. We have no control over the authority, the quality or safety of the data input. You, and you alone are responsible for the accuracy and completeness of your records.

Whilst we have security measures in place to protect your data, it remains your responsibility to keep your sign in details secret, to sign off from the Thesaurus Software Ltd. product when you are not using it and to ensure there is no unauthorised access to your computer.

Where applicable, you are responsible for keeping your password and user details confidential. Nobody at Thesaurus Software Ltd. will ever ask you for your password, so please do not trust anybody asking you for it.

I. USER SNAPSHOTS/BACKUPS

From time-to-time, in order to resolve a user query, it may be necessary for us to request a backup of your data file or a payroll related document. We are extremely mindful that this information contains sensitive personal data and we take numerous steps to ensure their security. Data received is processed only for the purposes of resolving your query as advised in writing by you, and is done so by trained Thesaurus staff, your backup will never be shared externally without prior approval from you. User backups are retained for the minimum amount of time necessary, usually no longer than one week.

Every effort has been taken to maintain the highest possible levels of security, however we would draw your attention to section L below.

We are committed to compliance with applicable data protection legislation and where necessary will make available to users any information necessary to demonstrate compliance with their processing obligations.

If you are providing a backup to us in a bureau capacity, you are responsible for ensuring that you comply with all data protection laws and that you have prior approval to send the data to us.

J. EMAILING OF PAYROLL DOCUMENTATION

Should you select to use our software's emailing feature, your employee's payslips/P60s will be sent through our secure server. Every effort has been taken to maintain the highest possible levels of security and all emails are automatically deleted from our server once sent. To enhance the security of emailed files, we highly recommend that users utilise the password feature contained within the software. Finally, we would draw your attention to section L below.

K. SECURITY

We take the security of your data very seriously. Thesaurus Software Ltd. take numerous technical and organisational measures to prevent the loss, misuse or alteration of your personal information. These precautions include:

- Use of SSL encryption for sensitive data
- Hardware stored in secured data centres behind firewalls
- All access to information restricted by password and/or secure key
- Restrictions to what information can be accessed via any location

Whilst we undertake to maintain the highest possible levels of security practicable to protect data, it should be realised that no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure, and there is always some risk of unauthorised access. Thesaurus Software Ltd. cannot be held liable for any breach of security. Any information submitted to us is done so at your own risk.

L. UPDATES TO OUR PRIVACY POLICY

Thesaurus Software Ltd. reserves the right to change the content of this Privacy Policy at any time without prior notice. If we decide to change our Privacy Policy, we undertake to post any changes on our website so you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Therefore, we recommend that you check the Privacy Policy regularly.

M. YOUR RIGHTS

You may contact us if you have any questions about this policy, if you would like to see a copy of the information that we hold on you, if you would like that information to be corrected, request for it to be deleted or for restrictions to be placed on the processing of your data.

If you wish to raise a complaint on how we have handled your personal data, please contact us and we will investigate the matter.

Please email us at <u>privacy@thesaurussoftware.com</u>. Alternatively, send a signed letter to Thesaurus Software Ltd., Dublin Road, Ashbourne, Co. Meath, marked "Data Privacy Request".

If you are not satisfied with our response or believe our processing of your personal data is not in accordance with the law, you can complain to the Data Protection Commissioner.