### **Infocap Technologies**

### This privacy statement is effective as of February 2022.

Infocap Technologies Ltd is a subsidiary company of 360Globalnet Ltd. At <u>360Globalnet Ltd</u> ("**360**" or "**we**") we recognise the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which we operate. This Privacy Statement describes our general privacy practices that apply to personal information we collect, use and share about consumers and other individuals within our clients, business partners, supplier and other organisations with which 360Globalnet has or contemplates a business relationship.

You can view our UK GDPR Data Protection Policy on our website.

### Why and how we collect and use your personal information

We may collect your personal information as an individual for various purposes, such as the following:

### Access and use of websites or other online services

When entering one of our websites, or using an online service, we will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit to personalise your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services.

## Responding to your request for information, order, or support

When you contact us (online or offline) we collect information necessary to fulfil your request, to grant you access to the product or service, to provide you with support and to be able to contact you. We retain such information for administrative purposes, defending our rights, and relating to our relationship with you.

## Contacting employees of our clients, prospects, partners and suppliers

In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisers and authorised users) for purposes such as contract management, fulfilment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.

## **Visitor information**

We register individuals visiting our sites and locations (name, identification and business contact information) and use camera supervision for reasons of security and safety of persons and belongings, as well as for regulatory purposes.

## Marketing

Most information we collect about you comes from our direct interactions with you. We combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can choose to receive information by email, telephone or postal mail about our products and services, or sign-up for subscriptions. When visiting our websites or using our services we may provide you with personalised information. You can always opt-out from receiving personalised communication by sending us an e-mail.

Where we reference that we use your personal information regarding a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested (such as a website), we do this because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our products or services, for reasons of safety and security, or regulatory requirements other than regarding your agreement or request, we do this based on our or a third party's legitimate interests, or with your consent.

## **Sharing of Personal Information**

As an organisation we have implemented policies and procedures, for consistent protection of personal information. As a global company, we may share information about you with our subsidiaries world-wide and transfer it to countries in the world where we do business in accordance with this Privacy Statement. Please see our 360GN UK GDPR Data Protection Policy on this website for further information.

We only grant access to personal information on a need-to-know basis, necessary for the purposes for which such access is granted. In some cases, we use suppliers located in various countries. Where appropriate, we may share your personal information with selected partners to help us provide you, or the company you work for, products or services, or to fulfil your requests, or with your consent. When selecting our suppliers and partners, we consider their data handling processes.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal information to protect the rights or property of 360Globalnet, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

## Information Security and Accuracy

We intend to protect your personal information and to maintain its accuracy. We implement reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorised access, use and disclosure.

## **Retention Period**

We will not retain personal information longer than necessary to fulfil the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defence of legal claims in the countries where we do business.

## Cookies

Our websites use cookies. Cookies are small pieces of information which are sent by a website to your web browser and remain on your computer until they are deleted. They help us to improve our site and to deliver a better and more personalised service. They enable us:

1. To estimate our audience size and usage pattern.

2. To store information about your preferences, and so allow us to customise our site according to your individual interests.

- 3. To speed up your searches.
- 4. To recognise you when you return to our site.

This website uses Google Analytics, a web analytics service provided by Google, Inc. (Google). Google Analytics uses cookies. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that our advertisers may also use cookies, over which we have no control. Advertisers and other third-party websites which are linked to this site may process your personal data in accordance with their own policies and procedures. We do not accept any responsibility or liability for these policies.

This website also uses Lead Forensics, an IP address tracking technology, to identify businesses visiting our site and the pages that are being used. This helps us analyse data about web page traffic to develop and improve our website for business visitors.

## **Your Rights**

You can request to access, update or correct your personal information. You also have the right to object to direct marketing.

You may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the UK General Data Protection Regulation ("UK GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under UK GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal information.

# Complaints

If you have any complaints relating to our privacy policy or our use of your personal data, please contact us using the contact details set out above. You also have the right to make a complaint to the Information Commissioner's Office. Further information can be found at <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

## How to contact us

If you would like to contact us with any queries or comments regarding our privacy policy, please email us at: <u>dataprotection@360globalnet.com</u> or write to: The Data Protection Officer, 360Globalnet Ltd, Bourne House, 475 Godstone Road, Whyteleafe, Surrey, CR3 OBL.

## **Changes to our Privacy Statements**

From time to time we may update this Privacy Statement, as well as any other specific privacy statement. When making changes to this Privacy Statement, we will add a new date at the top of this Privacy Statement.