# **Repstor Privacy Policy V1.1**

### **General**

This privacy policy applies to all access to current or future Repstor Ltd, ("Repstor" and also referred to as "we", "our" and "us") web sites, services, software or applications operated or provided by Repstor. We take user privacy matters extremely seriously. We do not sell your data and use it as set out in this policy.

By visiting/using Repstor's current and future website(s), application(s) and/or domain name(s) at https://repstor.com, including any sub-domains or any device optimised version (collectively, the "Site"), or any linked, content, services, applications (each, a "Service") owned or provided by Repstor, you acknowledge and accept the terms in this Privacy Policy ("Policy").

### **Access to and Use of Services**

A separate agreement and/or terms and conditions governs delivery, access and use of the Services (the "Customer Terms and Conditions"), This Policy shall be incorporated by reference into the Customer Terms and Conditions. The organization (e.g., your employer or other entity or person) that entered into the Customer Terms and Conditions ("Customer") controls the terms governing the Services and any associated Customer Data.

This Privacy Policy does not apply to any applications or software not owned or provided by Repstor that integrate with the Services ("**Non Repstor Services**"), or any other third party products, services or businesses. This Privacy Policy describes the following information about collected by Repstor:

## Information We Collect and why

Most of our services do not require any form of registration which means that you may visit our sites or use our applications without providing us with any personal information about you. However, some services may require you to register and therefore to provide us with your Personal Data. The types of Personal Data we collect depend on the interactions you have with Repstor and the services you use, but generally may include your name and contact details including your email address, and information about your usage of the website or application. We may also collect additional information about you that you provide by responding to our questions and surveys. We may also receive your Personal Data by tracking how you interact with our services, for example by using cookies (on the use of cookies, see more information below). This data is collected in order for us to provide the services and to provide consent based marketing.

### **How We Collect Information**

#### Information You Give Us

We collect information that you give to us when you register or use our Services.

#### **Information We Collect Automatically**

We automatically collect certain information about your use and interaction with our Site and/or Services. This includes if you visit our website, we record data about all visitors who use our website and store this information in our systems. This data may contain information about you including the following: IP address, type(s) of operating system you use, type of device you use, date and time you visited the website, your activity and/or referring websites. We use your log information to troubleshoot problems, gather demographic information, customize your experience when accessing our Site, Services and other business purposes.

#### **Customer Service Information**

Emails, calls and other correspondence between us may be recorded for various purposes including: monitoring customer service quality or compliance, checking accuracy of the information you provide us or providing training for our staff. Any information obtained from you through Customer support will be treated in accordance with the provisions of this Policy.

#### **Billing information**

When you pay for Repstor services, we may ask for your billing information such as credit card or Bank Transfer, and billing address. This is so that we can charge you for service, calculate taxes due, and send you invoices. Credit card details are passed directly to our payment processor and doesn't ever go through our servers. If bills are settled by credit card we keep a record of the payment transaction, including the last 4 digits of the credit card number and the billing address so that we have a record and to facilitate support around the transaction if necessary. We store your billing address to ensure we can calculate any taxes due, to detect fraud, and to complete details on your invoices.

### **How We Use Information**

In order for us to provide and maintain our Site and Services, and to improve your user experience, we will use your information in accordance with your instructions, including any applicable terms in your Customer Terms and Conditions and applicable law. Repstor uses your information in furtherance of our legitimate interests in operating our Site, Services and business. Additionally, Repstor uses your information:

- Improve and safeguard our Services.
- Corresponding with you via Email to provide notices, answer queries and other activities related to the Services

- To abide by applicable Law
- Provide you with customer support.
- Investigate and help prevent security issues, abuse and breaches.

### With Whom We Share Information

#### **Disclosure With Your Consent**

Customers determine their own policies and practices for the sharing and disclosure of information, and Repstor does not control how a Customer or any other third parties choose to share or disclose information. We may disclose your information with your consent, which we may obtain in a number of ways, including:

- In writing;
- Via Phone call/direct interaction;
- Via web forms or by clicking on a link or button;
- Other similar mechanism.

We may on occasion share your information with third parties as necessary to provide Services to you or to support the technical operation and/or maintenance of our Services, including third party application that you may engage within the Services. We may also share information with our affiliates, agents, outside vendors or service providers to perform functions on our behalf.

When a third party acts solely on our behalf and otherwise as applicable, we use reasonable commercial efforts to require that party to follow the privacy practices stated in this Policy or have complementary privacy protections to protect your information.

We do not share your information with unaffiliated third parties except as permitted to do so in this Policy.

#### **Disclosure Without Your Consent**

In general, we may disclose your information without your consent to disclosure when we reasonably believe disclosure is appropriate in order to:

- Comply with the law (e.g., lawful subpoena or court order);
- Cooperate with or report to law enforcement agencies in investigations that involve users who use our Service Offerings for activities that are or seem illegal or illegitimate activities;

- · Enforce or apply agreements for our Service Offerings; or
- In connection with a merger, acquisition, public offering, sale of company assets, insolvency, bankruptcy, or receivership, subject to standard confidentiality requirements.
- To defend Repstor and our affiliates, licensors, officers, agents and representatives from legal claims and processes brought to us by third parties (including takedown notices);
- Use or disclose aggregated or de-identified data in our sole discretion.

### **How We Protect Information**

We use industry standard protocols and technology to protect your registered user information and personal data in order to guard and encrypt data for transmission in a format that prevents data theft by unauthorized third parties, including internal reviews of our data collection, storage and processing practices, security measures, and physical security measures.

Repstor is ISO270001 certified and our policies cover protection of customer data.

### **Cookies**

We may place 'cookies' and similar technologies in your computer or mobile device in order to track and collect data regarding your use of our Site and Services. Cookies are small text files that our Site transfers to you and that allow us to permit us to recognize you and obtain data such as how, when and how long you browse pages in our Site. You can configure your browser to refuse cookies.

# **Non Repstor Services**

### **Generally**

Our Site and services may also implement hyperlinks to the websites of our commercial partners and other third parties. If you click on such links, you are choosing to visit such websites, and will be redirected thereto. If you click on a third party link, our Policy and Service terms are no longer applicable and your browsing is at your own risk. We are not responsible for the privacy and personal data practices used by such third parties (including any tools, cookies, information or content contained thereinto), and we do not have control over the manner in which such third parties may collect, process, treat or use your personal data. You are strongly advised to check the privacy settings, policies and/or notices applicable to such third party sites and services prior to browsing or using such third party websites and/or services.

# Advertising, opt-out

From time to time, we may use Google Analytics, AdWords and/or AdSense tracking codes, along with other third party software tools (such as remarketing codes) in order to collect marketing analytics about the pages you browse on our Site or when you undertake specific actions through our services. These platforms may also use cookies, codes and other technologies to help us analyze our users' patterns. For example, third party vendors may show you Repstor's ads on certain websites across the Internet, even after you leave our Site. The collected information is anonymized, meaning it cannot be tracked back to individuals. Using Google and other analytics tools, we learn how to optimize, and serve ads based on a user's past visits, giving you a better experience. Our third party vendors may also use cookies and beacons to track your Internet browsing in order to serve you ads based on what they or us believe to be of your interest. Such information will be processed for purposes of evaluating your browsing activities and consumer preferences.

By using this Site, you consent to such disclosure, treatment and storage of data and/or personal data about you, either by us or by such third parties. In order to enforce and uphold your right to privacy, you have the option to elect not to receive this type of advertising from us or third parties, now or in the future. You can learn more about how to opt-out by browsing Google's opting-out and privacy pages located at www.google.com, or the Network Advertising Initiative website located at www.networkadvertising.org. In addition, you may set browser and system preferences for how other third parties serve ads to you.

### Your Rights with respect to Your Data

Repstor applies the same rights to all customers which are in compliance to the European Union GDPR regulations or other applicable law. These rights include the following:

- Giving consent for data use
- Access to your personal data
- Rectification correcting errors
- Erasure deletion of records
- Processing restrictions
- Data portability consent swapping your data between companies
- Ability to object
- Automated decision making and profiling implications.

To communicate with our Data Protection Officer and to avail of the rights listed above, please email <a href="mailto:privacy@repstor.com">privacy@repstor.com</a>.

Where you submit a Subject Access Request (SAR), we will respond to such requests in no more than 30 days.

More detail can be found here https://gdpr.eu/consumers-gdpr-data-privacy-rights/

# **Age Restriction**

Repstor does not knowingly collect any kind of information from persons under the age of thirteen (13). By using our Services and/or browsing the Site, you hereby represent and warrant that (i) you are at least thirteen (13) years of age — or older — as of the date of first access to the Site; and, (ii) if you are a minor (which may differ depending on the jurisdiction where you reside), you are accessing the Site under the direct supervision of your parent or legal guardian.

### **Amendments**

Repstor may change this Policy from time to time as laws, regulations, industry standards and/or our business evolves. We will post the changes to this page and encourage you to review our Policy periodically to stay informed. If we make changes that materially alter your privacy rights, Repstor will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Policy, you should deactivate your Services Account. Contact your Account administrator if you wish to request the removal of your personal data under their control.

### **Published and effective**

10th February 2021

### **Contact**

Repstor Limited, Scottish Provident Building, 7 Donegall Square West, Belfast BT1 6JH. <a href="mailto:privacy@repstor.com">privacy@repstor.com</a>