#### FIELO PRIVACY NOTICE

## Your privacy is critically important to us.

At Fielo we adhere to the following data protection principles:

**Accountability:** We are responsible for the protection of Personal Information entrusted to us.

<u>Transparency and Control:</u> We don't ask for your personal information unless we need it to provide you with a service or product. We inform customers when we collect their Personal Information and we honor their preferences for contacting them.

<u>Third Parties processing our information:</u> We choose trustworthy vendors and suppliers to process our Personal Information and we require them to commit to adequate privacy and data security standards. We require our partners to commit to privacy policies and standards that we consider adequate.

<u>Privacy and Security by Design:</u> We apply privacy requirements and the principles of our Privacy Policies when designing our product and when implementing new technologies internally. We implement technical, organizational, and physical security measures to ensure an appropriate level of security of the Personal Information we process.

# We collect and use the following Personal Data from you when you use the Services:

<u>User / Client Data</u>: Personal name, company address e-mail address mobile telephone number. In order to provide you with the Services and the Platform we also process on your behalf financial information and Personal Data contained in your accounting documents.

<u>Technical Data</u>: when you use the Service, certain information will be collected automatically by us, including; information about your use of the Platform and the Services; technical data, such as HTTP request data, unique user identifier and network performance);

## **How We Use Your Information Collected through our Sites**

We don't ask for your personal information unless we need it to provide you with a service or product that you have requested. Some examples include:

- \* Respond to Customer Service Inquiries;
- \* Resolve service disputes;
- \* Troubleshoot problems;
- \* Measure consumer interest in our products and services;
- \* Inform you about online and offline offers, products, services, events and updates;

- \* Deliver information to you that, in some cases, is relevant to your interests, such as product news;
- \* Customize your experience;
- \* Detect and protect us against error, fraud and other criminal activity;
- \* Enforce our agreed upon Terms of Use;
- \* Provide you with system or administrative messages, and as otherwise described to you at the time of collection.

### **Opt-out Preferences**

Should you provide information and opt-in to marketing, we will use your name and email address to send you periodic email from Fielo. Those who opt-in might also receive additional announcements from us about product updates, services or the company newsletter. Out of respect for your privacy, you may opt-out at any time and choose to stop receiving periodic email by following the unsubscribe instructions included in these emails, or you can contact us at <a href="mailto:Privacy@Fielo.com">Privacy@Fielo.com</a>

## **Cookies and other Tracking Technologies**

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Fielo uses cookies to help Fielo identify and track visitors, their usage of Fielo website, and their website access preferences.

Fielo visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Fielo's websites, with the drawback that certain features of Fielo's websites may not function properly without the aid of cookies.

Like most website operators, Fielo collects non-personal information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Fielo's purpose in collecting non-personally identifying information is to better understand how Fielo's visitors use its website.

From time to time, Fielo may release non-personal information in the aggregate, e.g., by publishing a report on trends in the usage of its website – this information is completely anonymized and contains no identifiable information.

Fielo also collects potentially personal information like Internet Protocol (IP) addresses for logged in users and for users leaving comments. Fielo only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personal information as described below in Data Disclosure.

Fielo may collect statistics about the behavior of visitors to its websites. For instance, Fielo may monitor the most popular solutions built on Fielo. Fielo may display this

information publicly or provide it to others. However, Fielo does not disclose personal information other than as described below.

Certain visitors to Fielo's websites choose to interact with Fielo in ways that require Fielo to gather personal information. The amount and type of information that Fielo gathers depends on the nature of the interaction. For example, we ask visitors who sign up to download an article to provide an email address and as well are asked to provide additional information, including as necessary the personal and financial information required to process the request.

In each case, Fielo collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Fielo. And visitors can always refuse to supply personal information, with the caveat that it may prevent them from engaging in certain website-related activities.

#### **Lawful Data Disclosure**

Your personal information is never shared outside Fielo without your permission, except under conditions explained below.

Fielo discloses personal and personal information only in response to a subpoena, court order or other governmental request, or when, Fielo believes in good faith that disclosure is reasonably necessary to protect the property or rights of Fielo, third parties or the public at large.

### **Security Protections**

Information collected through the Site is maintained within a secure operating environment.

Our team of infrastructure and security professionals continually monitors our web interfaces and ensures technology updates are made regularly to deter any attempts for unwanted intrusion.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it.

Please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Site, you can contact us at privacy@fielo.com

#### **Retention of Personal Information**

Fielo will retain Personal Information for as long as needed to provide the Services or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### Access to Personal Information

Fielo acknowledges that individuals have the right to access the personal information/data that we maintain about them. If you wish to exercise any other data protection rights that are available to you under your local data protection laws (such as the right to data portability or to data restriction) then please send your request to <a href="mailto:privacy@fielo.com">privacy@fielo.com</a> – and we will action your request in accordance with applicable data protection laws within 30 days. You have the right to complain to your local data protection authority if you are unhappy with our data protection practices.

Please note that as Controller we only collect information for our Clients, if you are a customer of one of our Clients, where we act as Processors, and would no longer like to be contacted by one of our Clients that use our service, please contact the client that you interact with directly.

#### Children, Parental Consent, and Privacy

Our site is not directed toward children under age 16. We do not knowingly collect information from anyone under age 16. If we find out that we have collected information from a child under age 16, we will delete that information immediately.

### **Notification of Changes to our Privacy Notice**

We reserve the right to modify this Website's Privacy Notice at any time. Any changes to this Notice will be posted to the Site. We encourage you to periodically review this page for the latest information on our privacy.

### Contact

If you have any questions regarding this Privacy Notice, please contact us by email at <a href="mailto:privacy@fielo.com">privacy@fielo.com</a>