

# Supplyo Privacy Policy

We are Site Passport Limited (Trading as Supplyo) of 101 George's St Upper, Dun Laoghaire, Co. Dublin, A96 F240 company number 561936 (Republic of Ireland).

We are committed to protecting and respecting your privacy. We hold, as with most businesses, personal information about our customers and people who may be interested in our products and services. This Privacy Policy sets out how we collect, process, and use personal data of those individuals and any other individuals who contact us.

We also collect, process, and use personal data of individuals on our databases that are accessed by our customers. To keep our databases up to date, we draw contact data from publicly available sources.

We may update this Privacy Policy from time to time at our discretion and in particular to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes to it.

## **1. Who is the controller of my personal data?**

Unless we notify you otherwise, Supplyo is the controller of your personal data as it is the entity who alone or jointly determines how or why your personal data is being processed.

## **2. What personal data do we collect?**

By personal data we mean identifiable information about you. Generally, this is likely to include information such as your name, email address, geographical business address, telephone number and your IP address if you access our website.

We may collect, use, store and transfer different kinds of personal data about you:

- Contact Data includes data such as your email address, telephone number and business correspondence address.
- Identity Data includes data such as first name, last name, username or similar identifier, job title and employer.
- Technical Data includes data such as internet protocol (IP) address, your login data, browser type and version, cookies, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and any communications we may send to you.
- Usage Data includes information about how you use our website such as information about your visit to our website, including the full Uniform Resource Locators (URL) clickstream to and through, pages you viewed or searches you made, page response times, download errors, length of visit, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- Marketing Data includes your preferences in receiving marketing from us and your communication preferences.

- Financial Data includes any payment data we receive from you or from any third-party payment provider that we use.
- Geo Location Data includes data about your location when you are using our mobile app.

### **3. How do we collect your personal data?**

We use different methods to collect personal data from and about you, including:

#### Collection directly from you

Most of the personal data we process about you comes directly from you. You may give us your name and contact details when filling in forms or corresponding with us by email, phone, mail, in person or otherwise including when you: -

- subscribe to our services, products, or email alerts, including any free trial.
- buy or express an interest in our products and services, including attending an event.
- use and interact with our website and/or mobile website.
- provide services to us.
- provide information to us about you, your company, and colleagues.
- apply to work with us.
- provide feedback or reviews to us, respond to a survey or questionnaire.
- fill in a form or sign up to receive marketing communications or newsletters from us.
- Otherwise contact us with queries, comments, or complaints.

We shall process all such personal data in accordance with this Privacy Policy. Certain personal data is mandatory to be provided to us in order that we can fulfil your request and we will make this clear to you at the point of collection of the personal data.

All personal data that you provide to us must be true, complete, and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this, and we may also report this to the appropriate authorities.

#### Automatic collection

We automatically collect technical information when you use our website and our mobile website, for example: IP address, log-in data, browser type, time zone setting and location and plug-in types when you interact with our website or our mobile website. We also collect data through cookies. Please see our cookies policy for further information and details.

Depending on the settings on your device, when you use our website, we may automatically collect your geo-location data to allow you to access particular functionality within the website.

#### Collection from other sources

We may collect information about you from third parties and public sources (such as public databases and social media websites). This is to ensure we have accurate, up to date or necessary information for us to communicate with you or to provide the best possible service. The types of information we may collect

include personal details (including name, and other demographic data) and business contact information (including postal address and telephone numbers).

#### 4. For which purposes and on which legal basis do we process your personal data?

We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are:

- consent (where you choose to provide it).
- performance of our contract with you.
- compliance with legal requirements; and
- legitimate interests. When we refer to legitimate interests, we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom, or interests.

We have set out below a description of all the ways we plan to use your personal data and which legal basis we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Purpose	Legal basis
Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Managing our contractual relationship with you.	Necessary for the performance of a contract to which you are a party.
Operating and managing our business operations and/or improving our products, service, and event experience.	Legitimate interest in ensuring the proper functioning of our business operations.
Marketing or communicating information to you related to our products and services, unless you have objected to such processing, as further described in the section 4 “How do we use personal data for direct marketing purposes?” We may also share personal data with our affiliates for this purpose, as further described at section 8 below.	Legitimate interest in ensuring that we can conduct and increase our business.
Sharing personal data with selected partners (including sponsors), as further described in section 8 below.	Legitimate interest in ensuring we can conduct and increase our business and those of our business partners.
Monitoring your use of our systems (including using technical tools to automatically monitor the use of our website and any websites and tools you use).	Legitimate interest in ensuring network and information security.
Improving the security and functioning of our website or our mobile website, networks, and information.	Legitimate interest in ensuring that you receive an excellent user experience.
Undertaking data analytics, i.e., applying analytics to business operations and data to describe, predict and improve business performance within our business and/or to provide a better user	Legitimate interest in ensuring the proper functioning of our business operations.

experience (details on how we run analytics on our website can be found in our cookie policy).	
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## 5. How do we use personal data for direct marketing purposes?

We may send you marketing communications to keep you up to date with our products and services, including those we think may be of interest to you.

### Do we send targeted emails?

We send targeted electronic direct marketing to business contacts at our clients or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our electronic direct marketing typically includes web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in an electronic direct marketing message, we will also use a cookie to log what pages you view and what content you download from our website or our mobile website, even if you are not registered at or signed into our site. Please see our Cookies Policy for further details.

### Do we maintain Customer Relationship Management (CRM) databases?

Like most companies, Supplyo uses customer relationship management (CRM) database technology to manage and track our marketing efforts. Our CRM databases include personal data belonging to business contacts at our clients and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted electronic direct marketing (including web/mobile website activity following links from our e-mails), website activity of registered users of our website or our mobile website and other business information included by Supplyo professionals based on their personal interactions with you.

### Do we combine and analyse personal data?

We may combine data from publicly available sources, and from our different email, website, mobile website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our website or our mobile website or connect to our website using your social media credentials). We combine this data to better assess your experience with Supplyo and to perform the other activities described throughout this privacy policy.

### What are your rights regarding marketing communications?

You can elect to not receive marketing communications from us by, or by utilising opt-out mechanisms in emails we send to you. You can also object to receiving marketing communications or request that your personal data be removed from our CRM databases by contacting us at [contactus@supply.io](mailto:contactus@supply.io).

## 6. What about sensitive data?

We do not generally seek to collect sensitive data (also known as special categories of personal data) from individuals, and we request that you please do not submit sensitive data to us. In the limited cases where

we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term "sensitive data" refers to the various categories of personal data including racial or ethnic origin, political opinions, religious, philosophical, or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life, or orientation.

### **7. What about persons 18 or under?**

We are concerned about protecting the privacy of children. We do not knowingly contact or collect information from persons under the age of 18. If you believe that we have received information pertaining to or from persons under the age of 18 please contact us at [contactus@supply.io](mailto:contactus@supply.io). If we become aware that a person under the age of 18 has provided us with personal information, we will take steps to delete such information.

### **8. Will we share your personal data with third parties?**

For our legitimate business interests to ensure we can conduct our business, we may share your personal data with members of our corporate group, our service providers, contractors, and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including IT service providers, payment providers, marketing agencies, accountants, auditors, and lawyers. We will provide our service providers, contractors, and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we will request that they delete your personal data or make it anonymous within their systems.

If we may need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety then in doing so, we may share your personal data with third party authorities and regulatory organisations and agencies.

If we choose to merge, sell assets, consolidate, or restructure, finance, or sell all or a portion of our business by or into another company then the new owners and corporate group members may use your personal data in the same way that we do as set out in this Privacy Policy.

Before we share your personal data with any third parties, we take the necessary steps to ensure that your personal data will be given adequate protection in accordance with relevant data privacy laws.

### **9. How long will your personal data be retained by us?**

We retain your information for no longer than necessary for the purpose for which it was collected. We maintain specific records management and retention policies and procedures, so that in determining how long your information will be stored, we will consider:

- the purpose(s) and use of your information both now and in the future.
- our global legal and contractual obligations; and
- what information we need to manage your relationship with us and to develop and deliver our products and services.

## **10. Do we transfer your data internationally?**

None of your personal data is stored outside of the EU.

Where your personal data is transferred outside Ireland, it will only be transferred to countries that have been identified as providing adequate protection for personal data or to a third party where we have approved transfer mechanisms in place to protect your personal data.

## **11. Data security**

We maintain organisational, physical, and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures, and guidance to maintain these arrangements considering the risks associated with the categories of personal data and the processing we undertake, including as appropriate:

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
- the ability to manage and transfer protected information among internal and external systems.
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and

## **12. Which rights do you have with respect to the processing of your personal data?**

Under certain circumstances data subjects have rights under data protection laws in relation to their personal data including:

- request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- request a rectification of your personal data: this right entitles you to have your personal data corrected if it is inaccurate or incomplete.
- object to the processing of your personal data: this right entitles you to request that Supplyo no longer processes your personal data.
- request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws and when we respond to your request, we shall notify you of any specific legal reasons that we have to retain your personal data.
- request the restriction of the processing of your personal data: this right entitles you to request that Supplyo only processes your personal data in limited circumstances, including with your consent.
- request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used, and machine-readable format) of personal data that you have provided to Supplyo, or request Supplyo to transmit such personal data to another data controller.
- request not to be subject to any decision that significantly affects you being taken by automated processing, including profiling.

Please contact us at [contactus@supply.io](mailto:contactus@supply.io) to exercise any of these rights. We will process any request in line with any local laws and our policies and procedures. We may ask you for additional information to confirm your identity and for security purposes, before disclosing the information requested to you.

We reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive.

### **13. What if you have questions or want further information?**

Any questions regarding this notice and our privacy practices should be sent to us at Data Protection Officer, Site Passport Limited, Trading as Supplyo, 101 George's St Upper, Dun Laoghaire, Co. Dublin, A96 F240, Ireland or by email [contactus@supply.io](mailto:contactus@supply.io)

If you wish to make a complaint about how we use your information, please contact us using [contactus@supply.io](mailto:contactus@supply.io) and we shall review and investigate your complaint and try to get back to you within a reasonable time. You do also have the right to contact the Data Protection Commission, see <https://www.dataprotection.ie/>