

DEF Software Privacy Policy

Effective May 25, 2018

DEF Software Limited, DEF Holdings Limited, and any future corporate affiliates ("DEF", "we", "us" or "our") are committed to protecting our users' privacy. This Privacy Policy covers the information we collect about you when you use our services, or otherwise interact with DEF, for example by visiting www.def.com, requesting information in electronic form, or attending an event, unless a different policy is displayed at that time.

This Privacy Policy is intended to help you understand the following:

- What information we collect about you and how we collect it
- How we use the information we collect
- DEF's legal basis for processing your personal information
- How we share the information we collect with third parties
- How we store and secure the information we collect
- How we transfer information we collect internationally
- How to access and control your information
- How to contact us about privacy questions or comments
- Other important privacy information

Services

Individuals may interact with DEF across a range of services and products, from seeking information available on or by request at our website, up through use of DEF's hosted solutions, such as MasterGov on Azure. We refer to all of these services and products in this Privacy Policy as our "Services."

User Options

This Privacy Policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of your Personal Information and how you can access and update certain information about you. If you do not agree with this policy, please do not access or use our Services or interact with any other aspect of our business.

End Users

Where we provide the Services under contract with an organization (for example your employer) that organization may be the "controller" of the Personal Information processed by the Services. For more information, please see Notice to End Users below.

Personal Information

Personal Information refers to any information relating to an identified or identifiable natural person. It does not include data where the identity of the individual has been removed.

What information we collect about you and how we collect it

We collect Personal Information from you when you contact us regarding our Services, register on our site for support services, subscribe to our newsletter or webinar series, register for or attend our events, ask to be included on an email or other mailing list, participate in an online forum, blog, or voluntary survey, download content or fill out a form. We may collect all or some of the following information: name, email address, phone number, company name, title, department, country and/or industry. Alternatively, you may visit our site anonymously. Any data we request that is not required will be specified as voluntary or optional.

Surveys

We may provide you the opportunity to participate in surveys on our site. If you participate, we will request certain personally identifiable information from you. Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information such as name, email, and phone number, and demographic information such as job title, income, location, and company size.

We use this information to send notice(s) to you, monitor site traffic, personalize the site, send participants email newsletter(s), and better understand our customers and prospects.

We may use a third party service provider to conduct these surveys; that company will be prohibited from using our users' personally identifiable information for any other purpose. We will not share the personally identifiable information you provide through a survey with other third parties unless we give you prior notice and choice.

Use of the DEF Hosted Services

When you use any of the DEF hosted services, such as MasterGov on Azure, we collect information about you when you input it into the Services or otherwise provide it directly to us.

Account and Profile Information: We collect information about you when you register for an account, create or modify your profile, set preferences. For example, you provide your contact information when you register for the Services. You also have the option of adding job title, and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Content you provide through our products: The Services include the DEF products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include, such as business contact information, and other information to be used by your customers. Content also includes the files and links you upload to the Services.

Information you provide through our support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, so that we can update you on the status of your support request or seek further information that would be helpful in resolving the issue.

Your use of the Services: We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; your election of invoicing or early payment options, and the type, size and filenames of attachments you upload to the Services.

Device and Connection Information: We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Cookies and Other Tracking Technologies: DEF and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

Information we receive from other sources

We receive information about you from other Service users, from third-party services, from our related companies, from your customers, and our business and channel partners.

Other users of the Services: Other users of our Services, including your customers, or your employer, may provide information about you when they submit content through the Services. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as the billing, technical, or other contact on your company's account.

DEF Partners: We work with a global network of partners whose solutions we embed and resell throughout our network. We provide information to these partners, such as billing information, billing and technical contact information, company name, evaluation information you have provided.

Other Partners: We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

How we use the information we collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

- To administer your account and facilitate your transactions
- To respond to customer service requests
- To send periodic emails when you have requested to receive them. (The email address you provide for order processing, may be used to send you information and updates pertaining to your order or request, in addition to receiving occasional company news, updates, promotions, related product or service information, etc.)

- To provide you the DEF services you have requested
- To improve our websites. (We continually strive to improve our website offerings based on the information and feedback we receive from you.)
- To personalize your experience. (Your information helps us to better respond to your individual needs.)

To market, promote and drive engagement with the Services: We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you.

For safety and security: We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights: Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

What basis do we have for processing your Personal Information

Legal bases for processing (for EEA users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies our legitimate business interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

How we share the information we collect

Third Parties With Whom DEF Shares Personal Information

Service Providers: We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including this Privacy Policy, and other policies and procedures designed to protect your information.

DEF Partners: We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights: In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect DEF, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

If DEF is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

Third Party Links: Other sites accessible through our website have their own privacy policies and data collection use and disclosure practices. Occasionally, at our discretion, we may include or offer third party products or services on our website as well as provide links to sites that are owned and operated by these third party providers. Please consult each site's privacy policy, as the information practices of these third party sites are not covered by our Privacy Policy. We cannot control their collection of information, and therefore have no responsibility or liability for the content and activities of these linked sites. While we continue to seek to protect the integrity of our own site, you should contact these sites directly if you have any questions about the use of the information that they collect.

How we store and secure the information we collect

The security of your Personal Information is important to us. We use data hosting service providers in the European Union to host the Personal Information we collect, and we use technical measures to secure your data. These security measures include: password protected directories and databases to safeguard your information and PCI Scanning to actively protect our servers from hackers and other vulnerabilities. DEF is also backed by security controls designed to protect your data, and we undergo an annual audit.

We implement these safeguards to protect your information, but no security system is impenetrable, and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is

absolutely safe from intrusion by others. Please contact us at team@def.co.uk with questions regarding our security measures.

You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications at all times.

How long will the data be stored

We will retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. How long we keep the information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account information: We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. Personal data associated with transactions on the DEF Platform is retained for the period of time legally required for audit purposes, typically 7-10 years, depending on the applicable law.

We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyse personal characteristics about you.

Information you share on the Services: If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display messages you sent to the users that received them and continue to display content you provided.

Managed accounts: If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account.

Marketing information: We retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your DEF account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

How we transfer information we collect internationally

International transfers of information we collect

We collect information globally and primarily store that information at DEF's HQ or hosted data centres in the European Union. We transfer, process and store your information outside of your country of residence, as required for DEF or our third-party service providers to provide you the Services. Whenever we transfer your information, we take steps to protect it.

How to access and control your information

Under certain conditions, including when other dispute resolution procedures have been exhausted, you may invoke binding arbitration. Please see "To Raise a Complaint," and "How to access and control your information," below.

Access/Choice/Opt-Out

You have the right to access your Personal Information. We provide you the opportunity to "opt-out" of having your information used for certain purposes or to unsubscribe from receiving future emails, when we ask for the information. If you no longer wish to receive emails, our newsletter and other promotional communications, you may opt-out of receiving them by following the detailed unsubscribe instructions at the bottom of each email or communication or by emailing us at team@def.co.uk.

If your Personal Information changes, to request removal of your personal information from our blog or community forum, or if you no longer desire our service, you may correct, update, amend, delete/deactivate it by emailing our Customer Support at support@def.co.uk or by contacting us by telephone or postal mail at the contact information listed below. We will respond to your request to access within 30 days.

Your rights in relation to Personal Information and how to exercise them (for EEA users)

Under certain circumstances EEA users have the following rights:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your data protection interests.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you. We may need to request specific information from you to help us confirm your identity and right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to Contact Us About Privacy Questions or Comments

If you have concerns regarding this Privacy Policy, first contact the DEF Privacy Coordinator (team@def.co.uk), or send written correspondence to: DEF Privacy Coordinator, The Quadrus, Boldon Business Park, Boldon, Tyne & Wear NE35 9PF UK 0191 519 7420.

To raise a complaint

Please contact DEF as specified above to address any complaints regarding DEF's handling of Personal Information. DEF will take steps to remedy any issues arising out of the General Data Protection Regulation.

Changes to DEF's Privacy Policy

If we decide to change our Privacy Policy, we will post those changes in this document, and/or update the Privacy Policy modification date at the top of this page. Policy changes will apply only to information collected after the date of the change. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a prominent notice on our Services. We encourage you to periodically review this page for the latest information on our privacy practices before proceeding to use our Services.

Privacy Policy Customer Pledge

We pledge to you, our customer, that we have made a dedicated effort to bring our privacy policy in line with the General Data Protection Regulation (GDPR).

Notice to End Users

Our services and products are intended for use by businesses. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services, is responsible for the accounts, and ultimately for your use of the Services. In such circumstances, the only Personal Information held in the Services for most end users will be the user's name and email address at the organization's domain name. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access and modify information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations
- change the email address associated with your account;
- restrict your ability to edit, restrict, modify or delete information

Cookies & Tracking Notice

Introduction

DEF and our third party partners, such as our advertising and analytics partners, use various technologies to collect information, such as cookies.

What types of technologies do we use?

Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

We use cookies that allow us to recognize your browser and capture and store certain information to provide you with secure access to the data and documents you are entitled to view. We have control over these cookies and they underlie our Privacy Policy. In order to be effective, we link the information we store in cookies to your user ID (email address if you have provided it to us).

Our service providers only use cookies that are not tied to Personal Information. The use of cookies by our service providers is not covered by our privacy statement. We do not have access or control over these cookies.

If you wish to disable cookies, or if you wish to browse our websites privately/anonymously/incognito, your web browser can be configured to do this.

Log Files

As is true of most websites, we use third party tracking-utility partners to gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data.

We use this information to analyse trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

How do we use cookies?

- Where strictly necessary. These cookies and other technologies are essential in order to enable the Services to provide the feature you have requested, such as remembering you have logged in.
- For functionality. These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of the Services more tailored.
- For statistics and analytics. These cookies and similar technologies collect information on how users interact with the Services and enable us to improve how the Services operate. For example, we use StatCounter cookies to help us understand how visitors arrive at and browse our products and websites to identify areas for improvement such as navigation, user experience, and marketing campaigns.

How can you opt-out?

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Services.

You will not be able to opt-out of any cookies or other technologies that are “strictly necessary” for the Services. You may be able to opt out of receiving personalized advertisements as described in the Privacy Policy.

Updates to this notice

This Cookies & Tracking Notice may be updated from time to time. If we make any changes, we will notify you by revising the "effective starting" date at the top of this notice.