

CUSTOMER AND SUPPLIER PRIVACY NOTICE

This privacy notice provides information about how OneAdvanced (“we,” “us,” or “our” for short) processes and protects personal data we obtain about our suppliers, and customers (and their personnel) where we are the **Controller**.

Please note for the majority of the services and data processing we carry out for our customers, OneAdvanced are a data processor and in such instances this privacy notice is therefore not applicable.

Introduction

This privacy notice explains how Advanced Computer Software Group Limited and all its subsidiaries (**OneAdvanced**) collect, use, maintain and retain personal data when providing products and services to our customers and suppliers.

Our Data Protection Office (DPO) provides help and guidance to assist us in meeting our obligations and to ensure we protect the data we hold about you. We take privacy seriously and take appropriate steps to protect the personal data we collect from you and to make sure that your personal information is kept secure and only used in line with this notice.

What personal information do we collect about you and for what purpose?

Customer and Account Management

Where we have entered into a contract with the company that acts as your employer to provide products and services, we will be required to process your personal data in order to manage our customer relationship, enter into and administer our contract with that company, arrange billing and financial arrangements, and resolve any specific queries that may arise about the company's contractual relationship with us, billing and any financial details, and/or the products and services we provide.

In order to carry out these activities, we will collect and process your full name, business email address, business contact number, company name and contact details, and information about any specific queries or requests you have.

We rely on 'Performance of Contract' or legitimate interests as our lawful basis for this processing. If we rely on legitimate interests, these are our legitimate interests in providing a high quality service to our customer and ensuring smooth and effective operation of our business and customer relationships.

Marketing

We collect your business email address, full name, company name, and your business contact number when you are our customer for the purposes of marketing our products and services to you.

We also send relevant business communications and support-related information to keep you informed about our services and business updates and certain products and services provided by our selected partners.

We rely on legitimate interests as our lawful basis for this processing.

Research and Development to Improve our Services.

OneAdvanced may process your personal data for the purposes of carrying out research to improve our products and services and otherwise undertaking further product development and improvement work, to ensure we are meeting users' needs, undertake analytics about users of our products and services and to provide a good user experience.

We use several methods to carry out our research. Where we carry out interview-based research and carry out any audio or video recordings of the research session, we will require your consent to participate. The personal data that we collect will depend on what you consent to but may include your name, contact details such as your email address, and phone number as well as your image, voice, and the opinions you express during the research activity. Where we carry out research that involves data that we process on our customers' behalf, we will do so only with their prior approval.

In addition, if you provide us with feedback, technical support requests, or other communications about our products and services, we may use this information for the research and development purposes identified above. Wherever possible, we will aggregate and anonymise this information so that it no longer identifies you.

We rely on 'Legitimate Interests' as our lawful basis for this processing. Specifically, our legitimate interests in improving our offering to customers and to develop and improve our products and services, and support third-party tool development.

Where we audio or video record your interviews for research purposes we will rely on consent as our lawful basis.

Webchat and Contact Us Form

We use a provider called "Qualified" for our webchat services. We will collect and use your Personal Data to provide you with information and advice about products or services that you may have requested using the Contact Us Form on our website or webchat.

We rely on 'Performance of Contract' and 'Legitimate Interests' as our lawful basis for this processing. Specifically, our legitimate interests in responding to queries raised regarding our products and services and to market our business to prospective customers.

We will retain the personal data for the duration of our relationship with you.

Suppliers

Where your company is supplying us with goods and services and we are the customer, we will collect your business contact information to enable us to contact you: this may include your full name, job role, work address, email address and contact number.

We rely on 'Performance of Contract' as our lawful basis for this processing.

Information We Collect from Third Parties.

We collect information about you from third party partners where you have shown an interest in our products and services. The types of information we collect may include your full name, the company you work for and your business email address.

Social Media, Marketing Agencies and Business Partners

We use social networking sites such as LinkedIn, Sales Navigator, Twitter, among others.

We do not control how your personal information is collected, stored, or used by such third-party sites. You should review the privacy policies and settings on any social networking site that you subscribe to so that you understand the information they may be sharing about you. If you do not want your networking sites to share information about you, you should contact that site and determine whether it gives you the opportunity to opt-out of sharing such information. OneAdvanced is not responsible for how these third-party sites may use information collected from you, or about you.

Who We May Share Your Personal Information With

We may pass your information on to our agents and service providers for the purposes set out in this privacy notice as set out below:

- **Marketing agencies specialising in social media** - so that we may connect with your social networks. We may provide access to our websites to marketing agencies such as Nomensa and to business partners so that we may generate interest in our products and services among members of your social networks and to allow you to share product and service interests with friends in your network.
- **Agents** acting on our behalf – to carry out search engine optimisation, modelling, analysis, market and customer research, statistical analysis to help improve our website and the way we provide the services that we make available to you. These agents include creative agencies, professional user experience testing agencies, and search engine optimisation agents. We do not provide personal information to these agents.
- Our **processors and sub-processors**, including IT system providers, such as Salesforce (our Customer Relationship Management system) our financial management system, IT infrastructure providers such as Microsoft (Azure) or Amazon (AWS).
- Our **email platform service provider** or other service providers we may use to send you service messages, and marketing messages.
- Other **OneAdvanced group companies** for general business purposes as we may benefit from expertise from within these businesses, back office and customer support, and to maximise the effectiveness of OneAdvanced group.
- The police, other **relevant law enforcement agencies**, regulators, public bodies
- Government bodies and regulators such as HMRC or data protection regulators worldwide.
- Our **legal and professional advisors** including our auditors (such as financial auditors or our ISO 27001:2013 certification body).
- **Debt recovery agencies** to pursue a debt if you do not pay on time.
- If an organisation takes over all or nearly all of our business assets, we may pass your personal information to them.
- To comply with the law.

Lawful basis for processing your information.

Our lawful bases for processing your information include:

- Legitimate interests pursued by us, third parties or selected partners that we work with to service our customers, promote and improve our products or services, or for research carried out to improve and develop our products and services;
- Performance of our contract with you; or
- Any legal obligation with which we are required to comply.

Duration of Processing

We retain personal data processed by us for as long as is necessary for the purpose for which it was collected, as set out in the table below.

Type of data	Retention period
Support service logs	12 months and deleted thereafter
Webchat	Kept for the duration of our contract with you
Communications	Kept for the duration of our contract with you
Research data	2 years after which it will be deleted.
Call recordings	12 months and deleted thereafter
Consent for email marketing	Kept until you unsubscribe
Cookies	See cookie policy

We may retain personal data for longer periods where required by applicable law or regulation, or to establish, exercise or defend our legal rights as provided for in the data protection legislation.

Third party websites

Where we have provided a link to third party websites from our sites, we do not take responsibility for the way they process your personal information. We recommend you review the privacy notice of each third-party website you visit and contact the website owner if you have any concerns or questions.

When do we Pass your Information Outside the EEA?

OneAdvanced has offices and subsidiaries in the UK, EU, USA, Canada, India, and Australia. We share data with authorised personnel at these offices in order to deliver our services and run our business for the purposes stated in this privacy notice. The OneAdvanced subsidiaries outside of the UK and EU are in locations that are not recognised as having in place adequate data protection laws. However, we have deployed appropriate safeguards in compliance with the applicable local/national data protection legislation in order to be eligible for data sharing between our offices at various locations.

We also use third-party providers or cloud-based service providers, which may be located outside the UK/EEA. In all such instances, we ensure that there are appropriate safeguards in place in line with the applicable data protection legislation.

With all organisations where data is shared (whether OneAdvanced subsidiaries or our third-party providers) or accessible outside of the UK or EEA, the appropriate safeguards we have in place include agreements using EU and/or UK (as applicable) approved Standard Contractual Clauses and which identify additional security measures as required by law.

Your Rights over your Personal Information Data Subject Rights

You have certain rights under the applicable data protection legislation depending on the jurisdiction of your geographical location. For jurisdictions in which GDPR or UK GDPR is applicable, these rights are described below:

Right to Access

OneAdvanced, at your request, can confirm what information we hold about you and how it is processed. This right may be exercised by:

- Existing customers: Please call the Support Desk.
- Job applicants: Please refer to the [recruitment privacy notice](#) on our careers page;
- Others or alternative method of contact: Please send an email to dataprotection@oneadvanced.com.

We will aim to respond to any requests for information promptly and in any event, within the time limits required by the data protection legislation and other applicable law. Please note that you may be required to verify your identity in order to receive the information.

Right to Rectification

Existing customers: You may update your data by amending your personal details held within the relevant application or via any suitable customer support portal that you may have access to as an OneAdvanced customer. Alternatively, you may contact the Support Desk to have your details rectified.

Visitors to our website, Marketing Leads and Prospective Clients: You may update your personal information submitted via our corporate website by contacting us via the [Contact Form](#) on our website.

Job applicants: Refer to the [recruitment privacy notice](#) on careers page. Others: Please email us at dataprotection@oneadvanced.com.

Subject to applicable law, regulations, exemptions, and applicable checks, we endeavour to update our records based on the accurate information provided by you.

Right to Object

You have the right to object to direct marketing where our lawful basis is legitimate interests. We may use legitimate interests as the lawful basis for direct marketing. You may opt-out of this anytime by following [instructions provided here](#).

Withdrawal of Consent

We do not rely on consent for our processing activities except for certain email marketing activities. In such an instance, you have the right to withdraw consent at any time. You may do this by [following instructions provided here](#) or clicking on the unsubscribe link in the relevant email that you received from OneAdvanced.

Right to be Informed

You have the right to be informed about the data that was process about you. This Privacy Nis intended to provide you with information about the personal data we collect about you, and how it is used. We intend to keep this Privacy notice updated to reflect any change(s) in our processing activities.

Other Rights

In addition to the rights specified above, you also have other rights such as the Right to Erasure, the Right to Restrict Processing, and the Right to Data Portability.

If you wish to exercise any of these rights, please contact the data protection team at dataprotection@oneadvanced.com.

Complaints

We have worked hard towards establishing and maintaining an efficient and effective data protection compliance framework within our organisation and complying with our obligations in relation to processing Personal Data. However, if you have any questions or concerns regarding this Privacy Statement or if you want to complain about our use of Personal Data, please contact us at:

Data Protection Office

The Mailbox

101 Wharfside Street

Birmingham

B1 1RF

Email: dataprotection@oneadvanced.com

You also have the right to lodge a complaint directly with the Data Protection Authority in the UK, EU member state or any other Regulatory body that regulates the use of Personal Data in your jurisdiction.

The main establishment of OneAdvanced is in the UK and the relevant supervisory authority is the Information Commissioner's Office (ICO). Please visit the [ICO website](#) for further information.

Who is your Data Controller?

Advanced Computer Software Group Limited (OneAdvanced) is a global company which is registered in England and Wales under company number 05965280, whose registered office is at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF and **is your Controller**.

Any subsidiary of OneAdvanced may also process your data.

Australia

Single Cell Mobile Consulting Pty Ltd (trading as Portt) is a company registered in Australia under company number ACN 142 778 005, whose registered office is at C/o BDO, Level 10, 12 Creek Street, Brisbane QLD 4000.

SWL Australia Pty Ltd is a company registered in Australia under company number 604 872 997, whose registered office is at C/o BDO, Level 10, 12 Creek St, Brisbane QLD 4000.

Mitrefinch (Australia) Pty Ltd is a company registered in Australia under company number ACN 106 680 406, whose registered office is at 30 11-21 Underwood Rd Homebush NSW 2140 Australia. C/o BDO, Level 10, 12 Creek Street, Brisbane QLD 4000.

Canada

Tikit Inc. is a company registered in Canada under company number 768080-5 whose registered office is 199 Bay Street, 5300 Commerce Court West, Toronto, Ontario, Canada, M5L 1B9.

England and Wales

Advanced Business Software and Solutions Limited (trading as OneAdvanced) is a company registered in England and Wales under company number 03214465, whose registered office is at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.

Advanced 365 Limited (trading as OneAdvanced) is a company registered in England and Wales under company number 02124540, whose registered office is at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.

Advanced Health and Care Limited (trading as OneAdvanced) is a company registered in England and Wales under company number 02939302, whose registered office is at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.

The National Will Register Limited is a company registered in England and Wales under company number 05914179, whose registered office is at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.

France

Kirona France SARL is a company registered in France under company number 793 177 940 00038 whose registered office is at Parc D'Activités la Folie Couvrechef, 18 Rue Bailey, 14000 Caen, France.

Ireland

Advance Systems International Limited (Ireland) is a company registered in the Republic of Ireland under company number 225199, whose registered office is at Unit 4L, The Square Industrial Complex, Tallaght Dublin 24, Tallaght, Dublin, Ireland.

Careworks Limited (trading as Advanced) is a company registered in the Republic of Ireland under company number 262153, whose registered office is Unit 4L, The Square Industrial Complex, Tallaght Dublin 24, Tallaght, Dublin, Ireland.

India

Advanced Business & Healthcare Solutions India Private Ltd (trading as OneAdvanced) is a company registered in India under company number U72900KA2001PTC028589, whose registered office is at Fortune Summit, 2nd floor 'A' Wing # 244, HSR Layout, 6th Sector, Hosur Main Road, Bangalore 560068, India.

United States of America

Advanced Legal Solutions Inc. (trading as OneAdvanced) is a company registered in Delaware under company number 7856661, whose registered office is at 3455 Peachtree Road NE, Suite 500, Atlanta, GA 30326, USA.

Mitrefinch Inc. is a company registered in Massachusetts under company number 001001077, whose registered office is at. 3455 Peachtree Road NE, Suite 500, Atlanta, GA 30326, USA.

Mitrefinch US Holdings Inc. is a company registered in Delaware under company number 6788205, whose registered office is at 3455 Peachtree Road NE, Suite 500, Atlanta, GA.

Cloud Trade Inc is a company registered in Massachusetts under company number 001357710 whose registered office is at 3455 Peachtree Road NE, Suite 500, Atlanta, GA 30326, USA.

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