

Data Privacy Statement

Last updated: May 2018

1. Introduction and acceptance of the Privacy Policy

Your privacy is important to us and we want you to feel confident about the privacy and security of your personal data. Expect Solutions Ltd is committed to protecting the privacy of individuals that enter into contracts with Expect Solutions Ltd, or individuals who visit the Company's Web sites and ask for information, or our partners.

The Expect Solutions Ltd Customer Privacy Policy (the "Privacy Policy") applies to all of the services and websites offered by Expect Solutions Ltd (hereinafter "Expect", "we" or "us"), which refer to this Privacy Policy. The term "customer" refers to customers, new customers (prospects), ex customers and visitors to our website and recipients of our digital services including marketing. The Privacy Policy defines how Expect protects your privacy and describes Expect's privacy practices in relation to the use of the Company's Web sites and the related applications, services and programmes which may be offered by Expect (collectively, the "services"), as well as individuals' choices regarding use, access and correction of personal information.

Expect offers different services and websites for different business purposes. The Privacy Policy applies to all of these, unless otherwise expressly provided, they are collectively referred to as "services" and "Websites" throughout this Privacy Policy.

By accessing and using Expect's Websites, entering into a Contract with Expect or one of our partners or using Expect's services, you agree and consent to the collection, use and disclosure of your personal data as outlined in this Privacy Policy. Your use of the Websites or of Expect's services, and/or the entering into a Contract with us or one of our partners, shall constitute your consent to our processing of that information. Before using or submitting personal data on certain sections of the Websites, in relation to a Contract or as part of our services, you might be asked to confirm your acceptance of this Privacy Policy, including electronically by checking box(es) and/or clicking on "I ACCEPT" or similar button(s). Your action in checking such box(es) and/or clicking on such button(s) and your use of this Website or of our services signify that you agree to the collection, processing, use and transfer of your personal data as described in this Privacy Policy. Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Privacy Policy, shall be regarded as conclusive and written evidence of your consent.

The Privacy Policy contains:

- The key points you need to know about how we collect and use your personal data
- What personal data we collect about you
- How we use any personal data we might collect about you
- For which purposes we use your personal data
- Why and with whom we share your personal data
- In which cases your personal data may be transferred abroad
- How we protect the security and confidentiality of your personal data

- The choices and rights available to you regarding our use of your personal data
- How you can contact us about our privacy practices and to exercise your rights

The Privacy Policy was last reviewed and updated by the date referenced at the top of the document and is effective as of that date.

2. Key points you need to know about how we collect and use your personal data

We collect and use your personal data to administer our relationship with you, including to respond to your enquiries or complaints, to inform you about products and services, partners, promotions and events, to administer and improve our Websites and services, to respond to requests from authorities, to comply with our contractual and legal obligations, and for other legitimate business purposes. Expect does not share, sell, rent or trade personal data with third parties for promotional purposes.

When you express an interest in obtaining additional information about the services, or registering to use the Websites, or registering for an event, you provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”) to contact you. In addition, when you purchase services or get registered for an event, Expect may also require you to provide the Company with means for financial qualification and billing information, such as billing name and address, and the number of employees within the organization that will be using the services (“Billing Information”) which is not considered personal data.

We may ask you for information to enable us to provide a service to you and we collect this information by telephone, written/digital correspondence or via the website. Subject to your consent where required by law, we use cookies and other technologies to track the use of our websites and services. To learn about our use of cookies and your rights in that respect see below.

Subject to your consent where required by law, we may use your personal data to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and conduct direct marketing.

We may share your personal data with third party providers that we engage to process data on our behalf, when such sharing is required by law or other situations as permitted by law. In accordance with applicable law, you have the right to access personal data we hold about you, to rectify, delete or erase inaccurate data, to object, at any time and free of charge, to the processing of your personal data for direct marketing purposes, as well other rights under applicable law.

This privacy policy only applies to how to Expect deals with your personal data. It does not apply to any other company or to any other company’s Websites even if you have accessed them through Expect. If you disclose your personal data to other companies your information will be dealt with according to their privacy practices.

3. What personal data will Expect collect?

For the purposes of this Privacy Policy, "personal data" means any information that identifies you, that could be used to identify you or that relates to you, and that you submit about you when interacting with us and/or is otherwise collected by us when you visit the Websites, by phone, by writing through order forms or in another manner. During our relationship with you we may collect and process your personal data, such as your name, address, telephone, email and other contact details, and any other information relating to you which you may provide, in the following cases:

- visit our Websites and look at our products and services;
- enquire about our products and services;
- enter into a Contract with us or one of our partners;
- participate in a promotion, event, survey or other marketing campaign we organise; or
- sign up for our newsletters and other promotional materials.

Personal Data that you provide us

The types of personal data we may obtain in connection with the previous cases are as follows:

- your name, address, and contact details (such as telephone & mobile numbers, email address)
- details of contact persons (such as name, address, function/title, telephone numbers, e-mail address);
- services provided through us or through one of our partners;
- financial and payment data such as banking details, invoices and payment terms as well as any personal data for fulfilling and legitimate processing billing information;
- complaints and enquiries;
- business profile;
- tax identification number where you request products or services that require such information; and
- responses provided in response to surveys.

Personal Data collected by automated means

When you visit our Websites, subject to your prior consent where applicable by law, we may collect personal data without you actively submitting such information, by automated means, using technologies such as cookies, web server logs, and similar technologies as described below.

The types of personal data that we may collect through your visits to the Websites or to the extent permitted under applicable law and, where required, subject to your express consent, are:

- the date and time of visit, referring address (location from which a visitor comes to the Websites);
- type of Internet browser, OS and device details;

Personal Data collected by third parties

Expect may also receive information about Customers from other sources, including third parties from whom we have purchased data, and combine this information with Data we already have about you. This helps us to update, expand and analyse our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you. We will ensure that any marketing campaigns are aligned to GDPR requirements.

4. How do we use your personal data?

Expect shall only process your personal data for the purposes described in this Privacy Policy or as otherwise permitted under applicable law. The processing of your personal data by Expect for the purposes described hereunder is based on your explicit consent or on the necessity to process your personal data for the purposes of our legitimate interests, as provided by Article 9, 2., (a) and (f) of the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (“GDPR”).

Your personal information may be processed, both by Expect and its affiliates, for purposes including:

- administer our relationship with you, including to respond to your inquiries or complaints;
- to assist in the provision of any goods, services or information you have requested and information about products and services offered through our partners;
- to administer, operate, maintain, and improve the Websites;
- for efficient customer management relationship;
- to simplify access to some interactive features on our Websites;
- to manage your accounts, orders, invoices and payments;
- to manage and provide after-sale services;
- to administer accounting and taxes;
- to respond to requests from administrative or judicial authorities; and
- to comply with applicable laws and regulations.

Providing personal data for these purposes is necessary and refusal would make it impossible for Expect to manage the Contract with you or to comply with its contractual and legal obligations. Subject to your consent where required by law, we may also use your personal data in order:

- to keep improving the way our website works.
- to count how many persons visit our websites, where they come from, when they visit, how long they stay and what pages they look at.
- to associate your activity on our website in order to give us insights into products and services you might like and measure how our advertising performs
- to note browser, OS and device details used to make sure you get a good online experience when you access our websites.
- to provide you access to valuable Expect internet-based information;
- to audit usage of the Websites;
- to market and improve the services that we offer; and
- to conduct promotions campaigns, survey and other marketing initiatives
- let you know about other offers and discounts

- understand how you use products & services to develop newer & better versions
- carry out research and statistical analysis including to monitor how all customers use our network, products and services on an anonymous or business by business basis
- prevent and detect fraud or other crimes, recover debts or trace those who owe us money

Providing personal data for marketing purposes is optional and refusal will have no consequence on the performance of any Contract by Expect or one of Expect's partners. In order to provide you with a better experience and to improve the quality of our services, to the fullest extent permitted by applicable law, we may combine the information you submit to us with other information that we may receive from you, from third parties, or with other public demographic information.

In addition, we collect information from visitors to our websites to help us to make improvements to the websites and to the services we make available. We know, for instance, how many visitors there are to each website page, when they visited, for how long and to which areas of the website. We may share this information with our advertisers and to other companies that offer their goods or services on our websites. It helps us to show these organisations how effective our website is as a sales channel for products. You or any other individual cannot be identified from the information we share as the data is aggregated and anonymised.

5. Why and with whom do we share your personal data?

Our policy is to not give, sell or otherwise distribute personal data we collect to third parties outside of Expect and Expect's partners, except where required with your express consent or where this is necessary and in accordance with applicable law. In line with this, we share personal data with the recipients listed below.

Third party service providers. Your personal data may be disclosed to third party service providers, acting on our behalf, in connection with managing services, data analytics, finance, accounting or other administrative services and information technology support. These third party service providers will have access to – and process – personal data only on our behalf and under our instructions and will be held to appropriate security obligations.

Expect's business partners. A list of such partners could be provided to Customers upon request provided there is a legitimate reason.

Other data recipients. For the above purposes or where otherwise required by law, we may also need to make personal data available to third parties such as advisors, banks and financial institutions, professionals, independent consultants, potential or existing investors and/or acquirers (in connection with a merger, acquisition, or sale involving Expect or its affiliates or as part of a corporate reorganisation, stock or asset sale, or other change in corporate control), regulatory and/or administrative authorities, courts, police authorities. Expect may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders, when required to do so by law, for example under a court order, or in response to properly made court or administrative demands. Expect may also provide information for the purpose

of safeguarding national security. In either case, Expect will act in accordance with applicable Data Protection Law.

We may also disclose personal data about you when you explicitly consent (via contract or other legal instrument) to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by the data subject's interests or fundamental rights and freedoms, in accordance with applicable laws.

We may share with third parties certain pieces of aggregated, non-personal information, such as how our customers use of our services or Websites. Such information would not identify you individually.

Please note that when you order goods and services from Expect or Expect's partners, the Expect of the Expect partner may make enquiries about you for credit reference purposes. These enquires include searching your records held by a credit reference agency. At all times where your information is disclosed to us we will protect it in accordance with this policy and keep it secure.

6. How is your personal data protected?

Expect has appropriate policies and technical and organisational measures in place to safeguard and protect your personal data against unlawful or unauthorised access, accidental loss or destruction, damage, unlawful or unauthorised use and disclosure. We will also take all reasonable precautions to ensure that our staff and employees who have access to personal data about you have received adequate training.

7. How long do we keep your personal data for?

We have a retention policy for personal data that we adhere to, in line with legal and statutory requirements. For further details regarding this please contact Expect using the email address info@expect-uk.com. We also may retain your information for the period of time needed for Expect to pursue legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

8. How can you update or delete your personal data

In accordance with applicable data protection laws, you have the right to access personal data we hold about you and request the rectification or erasure of any inaccurate data. You may exercise such rights by contacting us as described under the "What are your data protection rights?" section below.

To ensure any details we hold about you remain accurate, please send a request to us as described under the "What are your data protection rights?" section below. If you close your account we may, for limited periods and in accordance with applicable law, retain some personal data in order to comply with legal obligations or for other proper purposes, such as legal retention obligations, collecting outstanding debts or resolving legal disputes.

When you request to be removed from certain marketing offers, you will, in accordance with applicable data protection laws, be added to the relevant internal suppression list(s) to

ensure your request is complied with.

9. How do we use your personal data for marketing purposes?

We may use your personal data to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and direct marketing purposes in general, including sending notifications about updates to the Websites, information on partner services we think may be of interest to you, initiatives or events by mail, e-mail, phone, fax, SMS, MMS or other electronic means. However, we will only do so in accordance with GDPR requirements prior to being contacted in this way and/or subject to relevant legal requirements. If you no longer wish to receive marketing information, please inform us by email or using the UNSUBSCRIBE option available on the communication.

10. What are your data protection rights?

In accordance with applicable data protection law, you have a right to:

- obtain confirmation of the existence of, and to request a written copy of the personal information Expect holds about you.
- have any inaccurate information about you corrected;
- have personal data we hold about you deleted, blocked or removed;
- withdraw your consent where relevant, without affecting the lawfulness of processing based on your consent before its withdrawal;
- restrict the processing we make in relation with your personal data;
- receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format in order to transmit them to another data controller;
- object to the use of your details for marketing activities and other promotional activities, as described under the "How do we use your personal data for marketing purposes?" section previous; and
- lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data relating infringes applicable data protection law.

In case you wish to exercise any such rights, please send a written and signed request to Expect as described under the "How can you contact us?" section below.

11. What happens if you visit a linked website?

The information obtained by third party websites accessed via our Website is not covered by this Privacy Policy and is governed by the terms applicable to your relationship with that third party and Expect accepts no responsibility or liability in respect of third party websites.

12. How can we update this Privacy Policy?

We reserve the right to review this Privacy Policy at any time. Where appropriate or required by law, we will notify you about the new privacy Policy by posting appropriate notice on our Website or by e-mail (to the extent that we have your e-mail address). We encourage you to periodically review this Privacy Policy to stay informed about our information practices. We will indicate above the date on which this Privacy Policy was last modified. Your continued use of our services or Website and participation in Expect events constitutes your agreement to the revised Privacy Policy. If you do not agree to the new Privacy Policy, you must

discontinue.

18. How to contact us?

If you have any questions about this Privacy Policy, or if you wish to exercise your rights under applicable data protection laws, please feel free to contact us through our Website or write to us at:

Expect Solutions Limited
117-121 Curtain Road | London | EC2A 3AD | UK
We can be reached via email at info@expect-uk.com

Cookie Usage

Introduction

Cookies are usually a small piece of data sent from a website and stored on a user's computer while the user is browsing the website. Although cookies cannot carry any virus, they help us understand which sections of our websites are the most popular as they help show which pages are being visited and for how long. This helps us adapt our websites to provide more relevant and accessible information. For example, cookies allow us to ensure that the information displayed on your next visit to our websites will match up with your user preferences. You may configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please note, however, that disabling cookies might affect your online experience and/or prevent you from taking full advantage of our site and some of its functionality. If you choose to restrict cookies you will have to provide certain information each time you visit our website and reset your preferences.

Advantages of cookies are

1. Remembering the details as provided by the user.
2. Remembering user preferences.
3. Helping improve the website.
4. Cookies can be deleted by the visitor.
5. Cookies can be blocked by changing browser setting.
6. Cookies cannot carry any threat to the visitor's device.

Details of Cookies which Expect may be placing on your device

- **Session Cookies (Non-Persistent Cookies):** Session Cookies are the cookies which exist only while the user is on a particular website. These cookies are deleted once the user exits the web page.
- **Persistent Cookies:** Persistent Cookies are the cookies which remain on your device for a longer period of time. They are used to recognise a return visitor as a unique user. If the visitor restricts persistent cookies, these cookies fail to gather any information about that visitor.

- **Third Party Cookies:** Certain third party cookies placed on your device are used for analytical and advertising purposes. These cookies can be persistent or non-persistent and are placed from different domain names.

Blocking/Restricting Cookies

You may restrict cookies by changing the browser setting.

More Information

For more information on cookies and their use visit:

www.allaboutcookies.org

http://en.wikipedia.org/wiki/HTTP_cookie