

Privacy Policy

This Privacy Policy describes how Genial Compliance Systems Limited (Genial Compliance) collects, uses and discloses information, and what choices you have with respect to the information.

Introduction

Your personal data is data by itself or with other data available to us can be used to identify you.

Applicability of this Privacy Policy

This Privacy Policy applies to Genial Compliance's online iPassport eQMS tool, including any associated iPassport mobile application (collectively, the "**Services**"), genialcompliance.com and other iPassport or Genial Compliance websites (collectively, the "**Websites**") and other interactions (e.g., customer service inquiries, user conferences, etc.) you may have with Genial Compliance. If you do not agree with the terms, do not access or use the Services, Websites or any other aspect of Genial Compliance's business.

This Privacy Policy does not apply to any third party applications or software that may integrate with the Services through iPassport ("**Third Party Services**"), or any other third party products, services or businesses.

Information we collect and receive

Genial Compliance may collect and receive Customer Data and other information and data ("**Other Information**") in a variety of ways:

- **Customer Data.** Customers or individuals granted access to a user account on iPassport by a Customer ("**Authorized Users**") routinely submit Customer Data to iPassport when using the Services.
- **Other Information.** Genial Compliance also collects, generates and/or receives Other Information:
 - I. System (iPassport) and Account Information. To create or update a user account, you or your Customer (e.g., your employer) supply Genial Compliance with a first name, family name, username, email address, password. When a Customer purchases iPassport the Services provide Genial Compliance (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
 - II. Usage Information.
 - *Services Metadata.* When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way Authorized Users work. For example, iPassport logs the activity against work undertaken within the iPassport account.
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use iPassport and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the internal web page visited, the address of any external web page visited form within iPassport, browser type and

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settings, the date and time the Services were used, preferences and cookie data.

- *Device information.* Genial Compliance collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - *Location information.* We receive information from you; your Customer and other third-parties that helps us approximate your location. We may, for example, an IP address received from your browser or device to determine approximate location.
- III. **Cookie Information.** Genial Compliance uses cookies and similar technologies in our Websites and Services that help us collect Other Information. For more details about how we use these technologies, please see our Cookie Policy.
- IV. **Third Party Services.** There are no third party Services that iPassport supports, as such Genial Compliance does not use third party service. See also Third Party Service Providers and Partners.
- V. **Contact Information.** In accordance with the consent process provided by logging into iPassport, any contact information that an Authorized User chooses to import (such as address) is collected when using the Services.
- VI. **Third Party Data.** Genial Compliance do not undertake any Third Party Data collaboration.
- VII. **Additional Information Provided to Genial Compliance.** We receive Other Information when submitted to our Websites or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with Genial Compliance.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “**Information**”) other than that required for a user account within iPassport. However, certain Information is collected automatically and, if some Information is not provided, we may be unable to provide the Services.

The types of personal data we collect and user

If you become a user on an iPassport account hosted and maintained by Genial Compliance we’ll use some personal data to manage this user account.

Personal data we may use includes:

- First name and family name (required)
- Username (required)
- Work email address
- Home address and contact details including telephone number and personal email address
- Education

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We'll tell you within iPassport where personal data is required.

How we use information

Customer Data will be used by Genial Compliance in accordance with Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and as required by applicable law. Genial Compliance is a processor of Customer Data and the Customer is the controller. Customer may, for example, use the Services to grant and remove access to a user account, assign roles and configure settings, access, modify, export, share and remove Customer Data and otherwise apply its policies to the Services.

Genial Compliance uses Other Information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically, Genial Compliance uses Other Information:

- **To provide, update, maintain and protect our Services, Websites and business.** This includes use of Other Information to support delivery of the Services under a Service Level Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Authorized User's request.
- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To develop and provide search, learning and productivity tools and additional features.** Genial Compliance tries to make the Services as useful as possible for specific accounts and Authorized Users. For example, we may improve search functionality by using Other Information to help determine and rank the relevance of content when performing searches within the account.
- **To send emails and other communications.** We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services but you do have the opportunity to opt out through the system. In addition, we sometimes send emails about new product features, promotional communications or other news about iPassport. These are marketing messages so you can control whether you receive them by contact us.
- **For billing, account management and other administrative matters.** Genial Compliance may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- **To investigate and help prevent security issues and abuse.**

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, Genial Compliance may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as "**Personal Data.**"

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Monitoring of communications

Subject to applicable laws, we'll monitor and record emails, in relation to your dealings with us. We'll do this for regulatory compliance, self-regulatory practices, to protect the security of our communications and procedures, for quality control, and staff training.

Data retention

Genial Compliance will retain personal in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and as required by applicable law. Unless specifically requested personal data is stored for the lifetime of the account. Customer Data is retained for the lifetime of the account/ service agreement. Genial Compliance may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after your account has been deactivated for the period of time needed for Genial Compliance to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

At no point is it possible for a Customer to purge all personal information from the account, as this is required to meet legal obligations. As such a user's first name, and family name shall be maintained within the iPassport account for the lifetime of the system.

How we share and disclose information

This section describes how Genial Compliance may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and Genial Compliance does not control how they or any other third parties choose to share or disclose Information.

- **Customer's Instructions.** Genial Compliance will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and in compliance with applicable law and legal process.
- **Displaying the Services.** When an Authorized User submits Other Information, it may be displayed to other Authorized Users in the same account. For example, an Authorized User's email address may be displayed with their user profile. Please consult the user guides for more information.
- **Collaborating with Others.** Information, such as an Authorized User's profile Information, may be shared, subject to the policies and practices of the user and account.
- **Customer Access.** Owners, administrators, Authorized Users and other Customer representatives and personnel may be able to access, modify or restrict access to Other Information.
- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services.
- **Third Party Services.** Genial Compliance does not share your data or details with Third Party Services.

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- **Corporate Affiliates.** Genial Compliance may share Other Information with its corporate affiliates, parents and/or subsidiaries.
- **During a Change to Genial Compliance's Business.** If Genial Compliance engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Genial Compliance's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes, such as telling a prospective Genial Compliance customer the average amount of time spent on a typical account.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property or safety of Genial Compliance or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- **With Consent.** Genial Compliance may share Other Information with third parties when we have consent to do so.

Security

Genial Compliance takes the security of data very seriously. Genial Compliance works hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. To learn more about current practices and policies regarding security and confidentiality of the Services, please see our Security Practices. Given the nature of communications and information processing technology, Genial Compliance cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

Age limitations

To the extent prohibited by applicable law, Genial Compliance does not have an age limitation although it is expected that due to the nature of work conducted users would be above 18 years of age.

Changes to this Privacy Policy

Genial Compliance may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, Genial Compliance will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you

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should deactivate your user of Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

International data transfers and contractual terms

Genial Compliance may transfer your Personal Data to countries other than the one in which you live.

European Union Model Clauses. Genial Compliance offers European Union Model Clauses, also known as Standard Contractual Clauses, to meet the adequacy and security requirements for our Customers that operate in the European Union, and other international transfers of Customer Data. A copy of our standard data processing addendum, incorporating Model Clauses, is available [here](#).

Data protection officer

To communicate with our Data Protection Officer, please email:

support@genialcompliance.com

Identifying the data controller and processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, Customer is the controller of Customer Data. In general, Genial Compliance is the processor of Customer Data and the controller of Other Information.

Your rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. You can usually do this using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact Customer for additional access and assistance. Please check About iPassport for Customer contact information.

To the extent that Genial Compliance’s processing of your Personal Data is subject to the General Data Protection Regulation, Genial Compliance relies on its legitimate interests, described above, to process your data. Genial Compliance may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to Genial Compliance’s use of your Personal Data for this purpose at any time.

Data protection authority

Subject to applicable law, you also have the right to (i) restrict Genial Compliance’s use of Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority. If you are a resident of the European Economic Area and believe we maintain your Personal Data within the scope of the General Data

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Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority.

Contacting Genial Compliance

Please also feel free to contact Genial Compliance if you have any questions about this Privacy Policy or Genial Compliance's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at support@genialcompliance.com or at our mailing address.