

## Privacy Policy - June 2022

### Inspirisys Solutions Limited Group Privacy Policy

Inspirisys Solutions Limited (hereafter ISL) is an IT service & consulting company that provides a wide range of IT services. These services include infrastructure services, managed services such as infrastructure support, cloud and mobility services, software development services, product engineering services, IoT services, and enterprise security & risk services. ISL is fully committed to ensuring the proper, open, and transparent management and use of all personal information and/or data it collects and handles complies with applicable privacy laws. This privacy policy applies only to external personal information and/or data provided by clients, suppliers, and other external third parties that ISL interacts with.

This Privacy Policy (Policy) applies to all of ISL entities and its affiliated entities in countries in which ISL operates and subject to the applicable privacy laws in the jurisdiction where the entity operates (refer to **www.inspirisys.com** for our locations). It sets out ISL's policy on the management of personal information and/or data that it may receive or collect.

Personal information and personal data for the purpose of this Policy is defined as "any sort of information or an opinion about an individual, whether true or not", and includes all personal data about an individual, or which can be used to identify an individual either directly or indirectly (referred to collectively as "**Personal Information**").

A sub-category of Personal Information is **sensitive information** and data. For the purposes of this Policy, sensitive information and data include information of a particularly sensitive nature, such as information relating to an individual's health, racial or ethnic origins, political opinions, membership of a trade union or political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences or criminal record.

#### 1. WHAT PERSONAL INFORMATION DOES ISL COLLECT, FROM WHOM AND FOR WHAT PURPOSE?

ISL will only collect Personal Information that is necessary for its functions and activities. It will only collect Personal Information by fair and lawful means. ISL may collect and process personal information through a variety of means, including, as examples, access to ISL sites or services, employment processes, or correspondence with ISL representatives, through the purchase of goods or services or in the course of online services and other marketing activities. ISL collects and holds different categories of information depending on the services being provided and the jurisdiction in which those services are being provided. The following types of Personal Information may be collected:

##### a) Information about ISL Contractors and Suppliers

ISL collects, directly from our contractors and suppliers, Personal Information about them. This Personal Information includes their name and contact details which allows them to be contacted. For workplace health and safety reasons, we may also collect from contractors, certain "sensitive information" with consent; for example, medical information a contractor has provided us about any injuries he or she may currently suffer.

From third parties, we may also collect feedback and information relating to our contractor's and suppliers' performance of services for ISL. This information is collected to monitor our contractor's and suppliers' performance of services and to ensure that we can provide the highest quality products and services to our customers.

#### **b) Information about job applicants**

Applicants for a position at ISL will be asked to supply details relevant to the job application such as name, contact details, the information contained in CVs, driver's license, or passport. We may also collect from third parties identified as referees Personal Information relating to the applicant. This information is used to determine suitability for the vacant role.

#### **c) Information about customers and their employees and customers**

Personal Information may be collected from customers such as name, contact details, bank account, and credit card details.

All personal information of the customers collected by ISL is used for our business functions and activities. These include:

- for billing purposes and order fulfillment;
- to contact customers about our provision of services; to maintain account details;
- to provide technical support e.g. account creation, password reset; to provide information on request about our products and services;
- to streamline and personalize customer experience while dealing with ISL;
- to undertake customer satisfaction surveys and to tailor ISL's information, services, or products to improve and enhance those services and products provided to our customers.

ISL may also collect from its customers Personal Information relating to its employees and customers; for example, payroll information. This Personal Information is used so that we can facilitate the provision of the services our customers have requested.

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## **2. QUALITY OF PERSONAL INFORMATION**

ISL will ensure, to the extent reasonably possible, that personal information collected, used, or disclosed is accurate, up-to-date, complete, and relevant. If ISL becomes aware that any of the personal information it holds is inaccurate, it will take prompt steps to update its records so that those records are correct.



### 3. DATA SECURITY

ISL takes active measures to ensure the security of Personal Information it holds is protected from misuse, interference, loss, and unauthorized access, modification, or disclosure.

All ISL ICT devices, storage, and channels are subject to continuous monitoring, logging analysis, and audit. ISL may choose to contract a third party to perform those functions.

All Personal Information is stored at secure premises using good quality security protocols.

ISL security systems are regularly reviewed and updated to maintain the integrity of the ISL security posture.

### 4. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Subject to verification of identity, any Personal Information held about an individual may be accessed, updated, or corrected by application to ISL by sending an email to [reachus@inspirisys.com](mailto:reachus@inspirisys.com) with the subject line "Privacy Policy - ISL."

There is generally no fee for an individual to make a request or to be provided access to his or her Personal Information. However, depending on the complexity of the request a reasonable processing fee may be charged in some cases.

ISL will endeavor to respond to access and correction of Personal Information within 15 business days after a written request is received by an ISL Officer.

### 5. DIRECT MARKETING

ISL will only engage in direct marketing practices under the laws of the relevant country or jurisdiction. At any time an individual or organization may contact ISL to request that they no longer receive any marketing material or information from ISL.

If you feel at any stage we have incorrectly used your Personal Information for direct marketing, please contact us immediately at [reachus@inspirisys.com](mailto:reachus@inspirisys.com) with the subject line "Privacy Policy - ISL."

### 6. DISCLOSURE AND RETENTION OF PERSONAL INFORMATION

As part of providing services to a customer, ISL may disclose Personal Information to third party suppliers and contractors of services or retain and disclose Personal Information as authorized by law for example metadata.

ISL may disclose some Personal Information to its affiliated entities in countries in which ISL operates for the purposes of providing services to our customers, including technical support.

Such disclosure is subject to the privacy laws applicable in the jurisdiction where that affiliated, entity is located.

A formal intragroup agreement is in place to ensure all Personal Information is properly protected at all times for transfers within ISL.

ISL only retains Personal Information for as long as required by applicable law or as needed for our business functions and activities. If Personal Information is no longer needed, it is then destroyed or disposed of securely.

## 7. INTERNATIONAL DATA TRANSFERS

As a provider and user of IT services, including cloud services, ISL retains Personal Information on servers that may be located in some overseas countries.

ISL recognizes and respects the varying national laws and obligations and their impact on cross-border data transfers when transferring or processing Personal Information outside of the country of collection for the purposes identified above. ISL will take all reasonable steps to ensure that no person or entity, breaches any relevant privacy and data protection laws using a variety of lawful data transfer mechanisms and contractual agreements for privacy and data protection.

## 8. WEBSITE BROWSING

Accessing ISL websites will result in some information being logged including the time of access, IP address, and the pages that have been viewed or accessed.

ISL also stores cookies from website browsing and uses to present relevant information and for website analytics.

ISL websites may contain links to external websites. ISL is not responsible for the content or privacy policies that govern such external websites.

By visiting our website, ISL does not automatically capture any specific personal information from you, (like name, phone number or e-mail address), that allows us to identify you individually.

## 9. PRIVACY ISSUES

ISL has legal obligations under privacy legislation to hold information securely and to use it appropriately in accordance with our privacy policy. If you feel we have breached these obligations, or have any questions about this Policy, or to raise any issues about privacy or data protection within ISL please contact ISL at:

Email: [reachus@inspirisys.com](mailto:reachus@inspirisys.com) with the subject line "Privacy Policy – ISL."

Due to the nature of the services that ISL provides, in most situations, it will be impracticable for an individual to deal with us on an anonymous basis. However, ISL will consider anonymous requests on a case by case basis.

If you are not satisfied with ISL response and the issue relates to a privacy concern or alleged breach by ISL, you may take your complaint to the relevant government authority responsible for privacy and data protection.

**Policy first update date: October 2018**