

# What this Privacy Statement covers

This Privacy Statement is intended to help you understand:

- *What information we collect about you*
- *How we use information we collect*
- *How we share information we collect*
- *How we store and secure information we collect*
- *How to access and control your information*
- *How we transfer information we collect internationally*
- *Other important privacy information*

This Privacy Statement covers the information we collect about you when you use our Platform or services, or otherwise interact with InvoiceFair (for example, attending InvoiceFair events), unless a different Privacy Statement is displayed. This Privacy Statement also explains your choices about how we use information about you.

We will use your personal data only for the purposes and in the manner set forth below, which describes the steps we take to ensure the processing of your Data is in compliance with Data Protection Law. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

When we refer to "InvoiceFair," "we," or "us" in this Privacy Statement, we mean InvoiceFair Ltd., as Data Controller of the information InvoiceFair collects when you use the Services. InvoiceFair has a web-based invoice trading platform which is operated by InvoiceFair in accordance with the Platform Rules. The Platform includes the online portal and webpages of InvoiceFair through which Members access and place information relating to an Auction, Fixed Rate Closed Auction, sold or purchased Receivables, and the Platform Ledger. We refer to all of these websites, applications and this Privacy Statement. If you do not agree with this Privacy Statement, you should not access or use our Services or interact with any other aspect of our business.

## **WHAT INFORMATION WE COLLECT ABOUT YOU**

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

### *Information you provide to us*

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, register for or purchase/sell a trade receivable through the Services. For example, you provide your contact information, bank details, proof of address and proof of identity. We keep track of your preferences when you select settings within the Services.
- **Content you provide through our products and Services:** When using the InvoiceFair Services we collect and store content that you email, send, receive and share. This content includes any information about you that you may choose to include. Content also includes the files and links you upload to the Services. Examples of content we collect,

and store include: Invoices, Contracts, Purchase Orders, Goods Received Notes, Invoice Trading Memos, Proof of Identity etc. Financial Accounts, and Bank Statements.

- Content you provide through our websites: The Services also include the websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, promotions, activities or events.
- Information you provide through our support channels: The Services also include 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, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue. Information we collect automatically when you use the Services.

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

- 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 frequency of visits etc. so that we can improve the customer experience of our Services in the future.
- 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, web browser, operation system and settings when you access or use our Services. We use this information to determine your location, to time zone granularity only, in order to provide you with a better Service experience - localised auction times and language. 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: InvoiceFair and our thirdparty partners, such as our analytics partners, use cookies and other tracking technologies (e.g. device identifiers and pixels) to provide functionality and to recognise you across different Services and devices. [Please click [here](#) to access our Cookie Policy<sup>1</sup> for further information.]

#### *Information we receive from other sources*

We may receive information about you from other Service users, from third party services (e.g. Experian) and from our business and channel partners.

- Other users of the Services: Other users of our Services may provide information about you when they submit content through the Services. For example, you may be uploaded as a Debtor by a Seller. We also receive your contact details from other Service users when they provide it in order to invite or recommend you to our Services.
- Other services you link to your account: We receive information about you when you or your administrator enable third-party services to integrate with our Services. For example, you may authorise our Services to access your company account information using a third-party accounting package integration service.

- InvoiceFair Partners: We work with a global network of various partners. Some of these partners help us to market and promote our products, generate leads for us, and/or resell our products. We receive information from these partners, such as technical contact information, company name, what products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.
- Other partners: We receive information about you and your activities on and off the Services from third-party partners, such as market research partners who provide us with credit score and limit information.

## **HOW WE USE 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 provide the Services and personalise your experience: We use information about you to provide the Services to you, including to process transactions for you, authenticate you when you log in, provide customer support, comply with Know Your Customer and Anti-Money Laundering regulations, and operate and maintain the Services. For example, we use the proof of identity, proof of address and picture ID, you provide in your account to identify you uniquely. Our Services also include tailored features that personalise your experience.
- For research and development: We are always looking for ways to improve the customer experience of our Services. We use collective learnings about how people use our Services, and feedback provided directly to us, to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. We also test and analyse certain new features with some users before rolling the feature out to all users.
- To communicate with you about the Services: We use your contact information to send transactional communications via email and within the Services, including confirming your trades, reminding you of upcoming settlements, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. Depending on your settings, we send you email notifications when you or others interact on the Services, for example, when you upload a receivable, purchase a tranche of a receivable via a winning bid, add a new Debtor, InvoiceFair update the Platform Rules etc.
- To market, promote, and drive engagement with the Services: Where you have opted-in / consented to receive promotional communications, 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. These communications are aimed at driving engagement and maximising what you get out of the Services, including information about upcoming trades that might be of interest to you, new features, survey requests, newsletters, and events we think may be of interest to you.
- Customer support: We use your information to resolve technical issues you encounter, to respond to your requests for assistance, and to repair and improve the Services.

- 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.
- 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. Lawful basis and legitimate interest 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 a legal basis for doing so under applicable Data Protection Law. 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 personalised features and to protect the safety and security of the Services;
  - It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to protect our legal rights, interests and the interests of others, and to comply with our legal obligations;
  - 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 INFORMATION WE COLLECT**

We share information we collect about you in the ways discussed but we do not engage in selling information about you to advertisers or any other third parties.

### *Sharing with other Service users*

When you use the Services, we share certain information about you with other Service users.

- Auctions: Buyers can see all of the registered Sellers and Debtors on the platform. The profile for each Seller and Debtor contains among other things the name, address, credit score, credit limit and deal history of the Seller and Debtor on the platform. Buyers cannot see other Buyers profiles.
- Community or Social Forums: Our website may offer publicly accessible blogs, forums, Twitter feeds etc. You should be aware that any information you provide in these websites - including profile information associated with the account you use to post the information

- may be read, collected, and used by any member of the public who accesses the websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. If for whatever reason we are not able to remove your information, we will inform you and the reason why.

### *Sharing with third parties*

We share information with third parties that help us operate, provide, improve, integrate, customise, support and market our Services.

- **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 instruction from us, and we will check any third-party service provides to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your data. We will have written contracts with them which provide assurances regarding the protections that they will give to your data and their compliance with our data security standards and international transfer restrictions.
- **Third-Party Widgets:** Some of our Services contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing it.
- **With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- **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 InvoiceFair, 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.

## **HOW WE TRANSFER INFORMATION WE COLLECT INTERNATIONALLY**

### *International transfers of information we collect*

We collect information globally and primarily store that information in the Ireland, UK and the Netherlands. We may transfer, process and store your information outside of your country of residence as a result. Whenever we transfer your information, we will (and will ensure that service providers acting on our behalf agree to) protect it from improper use

or disclosure and ensure the same levels of protection are in place as are applied with Ireland and the EEA.

## **HOW WE STORE AND SECURE INFORMATION WE COLLECT**

### *Information storage and security*

We use data hosting service providers in the Ireland, UK and the Netherlands to host the information we collect, and we use technical measures to secure your data. This includes various types and levels of encryption while data is stored or is in flight between our systems. While we implement safeguards designed to protect your information, 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.

### *How long we keep information*

How long we keep 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 anonymise 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 until you or an InvoiceFair administrator deletes your account. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, 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.
- **Managed/Organisation accounts:** If the Services are made available to you through an organisation (e.g., your employer), we retain your information as long as required by the administrator of your account.
- **Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created. Using the Settings feature within the Services you can control/modify what emails you receive.

## **HOW TO ACCESS AND CONTROL YOUR INFORMATION**

You may have certain rights available to you in relation to your data. These rights are not absolute and are subject to certain exemptions or qualifications. Below is a summary of those rights, how to exercise them and any limitations.

### *Your Rights:*

Subject to certain restrictions under Data Protection Law, you have the following rights:

- Right of access to your data;

- Rights in relation to inaccurate personal or incomplete data (including for marketing purposes);
- Right to have data erased;
- Right to object to or restrict our data processing;
- Right to withdrawal of data; and
- Right of data portability.

Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator you may need to contact your administrator to assist with your requests first.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted or obliged by law to keep.

Where you have asked us to share data with third parties, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted.

- **Access and update your information:** Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings.

- **Deactivate or delete membership to the platform:** An InvoiceFair administrator can deactivate your access to the platform at any time if you request. They can also delete membership which is not possible to reactivate again.

- **Object to or restrict our data processing:** subject to certain conditions, you have the right to object to or ask us to restrict the processing of your data.

- **Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this Privacy Statement. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. When you make such requests, we may need time to investigate and facilitate your request. If there is a delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honoured or the dispute is resolved.

- **Opt out of communications:** You may opt out of receiving certain communications from us by using the unsubscribe link within each email or updating your email preferences within your Service account settings menu. Certain transactional messages from us regarding our Services will always be sent for example winning bid notifications.

- **Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your profile and account information.

You may exercise all of these rights free of charge except in some very limited circumstances and we will explain these to you where they are relevant. If you wish to exercise any of these rights, requests should be made in writing (see Further information and advice about your rights can be obtained from the Office of the Data Protection Commission at Canal House, Station Road, Portarlinton, Co Laois, by telephone at 1890 25 2231 and/or by email to [info@dataprotection.ie](mailto:info@dataprotection.ie)).

If you have unresolved concerns, you may have the right to complain to the DPC at the contact details listed above.

## **OTHER IMPORTANT PRIVACY INFORMATION**

### *Notice to End Users*

Our products are intended for both personal use and use by organisations. Where the Services are made available to you through an organisation (e.g. your employer), that organisation is the administrator of the Services and is responsible for the end-users and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organisation's policies. We are not responsible for the privacy or security practices of an administrator's organisation, which may be different than this Privacy Statement.

Please contact your organisation or refer to organisational policies for more information.

### *Changes to our Privacy Statement*

We may change this Privacy Statement from time to time. We will post any Privacy Statement changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We encourage you to review our Privacy Statement whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this Privacy Statement, you will need to stop using the Services and deactivate your account(s), as outlined above.

### *Contact Us*

Your information is controlled by InvoiceFair. If you have questions or concerns about how your information is handled, please direct your inquiry to [it@invoicefair.com](mailto:it@invoicefair.com), InvoiceFair Limited, NexusUCD, Blocks 9 & 10, Belfield Office Park, Dublin 4 or +353 16632662.