

Privacy Policy and Cookies

Last updated: February 2016

Please read our privacy notice carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This notice applies to any website, application or service which references this privacy notice. Where you provide us with your personal information in any of the ways described in paragraph 2 below, you agree that we may use it as described in this privacy notice.

1. Who we are

If you are resident in Europe, the Middle East, Africa, Asia or Australia, you are dealing with Sage Global Services Limited a company incorporated in England (company registration number 09506951) whose registered office is at North Park, Newcastle upon Tyne, NE13 9AA. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number ZA138390.

If you are resident in North, Central or South America, Canada or the Caribbean, you are dealing with Sage Global Services US, Inc., a Delaware corporation whose address is 271 17th Street, Suite 1100, Atlanta, GA 30363.

If you purchase or subscribe to a local Sage product in your own country of residence e.g. Sage 50 in the UK, you are dealing with the relevant local Sage entity who licenses that product to you as confirmed in the relevant product licence terms. A current list of local Sage entities is set out at the end of this document.

The company you deal with is your data controller and is responsible for the collection, use, disclosure, retention and protection of your personal information.

Your data controller is a member of the Sage group of companies (whose parent company is The Sage Group Plc) (the "Sage Group") and may transfer data to other members of the Sage group of companies as outlined in this privacy notice. This privacy notice applies to all of the websites, applications and services offered by Sage Group and its affiliates excluding those websites, applications and services that have separate privacy notices that do not incorporate this privacy notice.

In this privacy notice "we", "our" and "Sage" each mean your data controller and all of the companies that make up the Sage Group.

2. How we collect information

We will collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services (including free trials); this may include your name, address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- interact with us using social media;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, fax, SMS, email or post.

We may also collect information from your devices (including mobile devices) and applications you or you users use to access and use any of our websites, applications or services (for example, we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information) we will ask for your permission before we do so. We may do this using cookies or similar technologies (as described in paragraph 6 below).

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

If you intend giving us personal information about someone else, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our privacy notice.

3. How we use your information

You agree that we may use your information to:

- provide any information and services that you have requested or any applications or services that you have ordered;
- compare information for accuracy and to verify it with third parties;

- provide any applications, products, services and information that you have requested from us;
- manage and administer your use of applications, products and services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, website, applications and services;
- undertake internal testing of our website, applications, systems and services to test and improve their security and performance. In these circumstances, we would anonymise any information used for such testing purposes;
- provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
- deliver joint content and services with third parties which whom you have a separate relationship (for example, social media providers); and
- provide you with location based services (for example, advertising and other personalised content), where we collect geo-location data.

We may retain information about you after the closure of your Sage account, if your application for a Sage account is declined or if you decide not to go ahead with it. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- check specific information from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with our website, applications and services;
- collect information about how you and users use the functions of the features of our website, applications and services; and
- gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services.

In addition to the purposes described in this paragraph 3, we may also use information we gather to deliver targeted advertising, marketing (including

in-product messaging) or information to you which may be useful, based on your use of the website, applications or services or any other information we have about you (depending on the websites, applications or services, you may be able to configure these features to suit your preferences). Paragraphs 5 and 6 of this privacy notice provides further details on how we will do this.

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

Mobile data

We may obtain information through mobile applications that you or your users install on their mobile devices to access and use our website, applications or services or which you or your users use to provide other services related to that mobile application (for example, to sync information from our application or service with such mobile application). These mobile applications may be our own mobile applications or those belonging to third parties. Where the mobile application belongs to a third party, you must read that third party's own privacy notice as it will apply to your use of that third party mobile application. We are not responsible for such third party mobile applications and their use of your personal information.

Mobile applications may provide us with information related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such information to provide and improve the mobile application or our own application or services. For example, activity undertaken within a mobile application may be logged.

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.

4. Sharing your information

We may share your information with:

- any company within the Sage Group including those companies listed at the bottom of this privacy notice, for the purposes set out in this privacy notice, (e.g. global information and customer relationship management; software and service compatibility and improvements; and to provide you with any information, applications, products or services that you have requested);
- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;

- third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);
- third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations (such as banks, insurers, finance providers), payment solutions providers, software and services providers that provide business solutions);
- credit reference and fraud prevention agencies;
- regulators to meet Sage Group's legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own and Sage Group professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets; and
- another organisation to whom we may transfer our agreement with you.

We may share non-personally identifiable information about the use of our website, applications, products or services publically or with third parties but this will not include information that can be used to identify you.

5. Marketing

From time to time, we may use your information to contact you with details about our applications, products and services which we feel may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) may contact you with information about their products or services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your details information on our websites, applications or services, using any preference centres we give you access to or by sending us an email to digital@sage.com. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

Third party platform advertising

We may share your information with third party platform providers (such as Facebook, Google and Twitter) to serve targeted advertising/content to you via the relevant third party platform based on your profile/interests. Your

information is used by the third party platform provider to identify your account and serve advertisements to you. You can control what advertisements you receive via the privacy settings on the relevant provider's platform and you should consult the third party's help/support centre for more information.

6. Cookies, Analytics and Traffic Data

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and also to help make our websites, applications and services better for you.

Our cookies may be **session cookies** (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or **persistent cookies** (cookies which enable our websites, applications or services to "remember" who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

[Find out more about the types of cookies that we use.](#)

[View a list of cookies that we use.](#)

| Description | Purpose |
|------------------|--|
| Google Analytics | <p>Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the websites, applications or services. The information generated by the cookie about your use of the websites, applications or services (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the websites, applications or services compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of this website. By using our websites, applications or services you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see "How Google uses data when you use our partners' sites or apps", (located at www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time)</p> |

| Description | Purpose |
|----------------|---|
| Salesforce.com | <p>uses the Salesforce.com platform. You can view Salesforce.com's privacy statements here which contain details of any cookies and analytics that are used within its platform and services: https://help.salesforce.com/apex/HTViewSolution?urlName=Cookies-in-the-Force-com-Platform&language=en_US and http://www.salesforce.com/company/privacy/full_privacy.jsp No service user state is maintained on the Salesforce web or application servers. Instead, after the user authenticates, the application generates a "cookie" for that user for only that session, with the following information: a version number that identifies the format of the cookie, a number that acts as the session ID and a routing hint."</p> |

How to disable cookies

You may be able to configure your browser or our website, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, applications or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the Internet Advertising Bureau website www.youronlinechoices.co.uk.

7. Your information

If we hold any information about you which is incorrect or if there are any changes to your details please let us know by so that we can keep our records accurate and up to date. If you would like to update your records or see a copy of the information that we hold about you, you can contact us at Data Protection Officer, Sage Global Services Limited, North Park, Newcastle-upon-Tyne, NE13 9AA or by email to globalprivacy@sage.com.

If you request a copy of your information you will need to pay the applicable statutory fee.

If you withdraw your consent to the use or of your personal information for purposes set out in our privacy notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes or to comply with applicable laws and regulation. Where we no longer need your personal information we will dispose of it in a secure manner (without notifying with you).

8. Changes to our privacy notice

We may change our privacy notice from time to time. We will always update the privacy notice on our website, so please try to read it when you

visit the website (the 'last updated' reference tells you when we last updated our privacy notice).

9. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your data which is transmitted to our website, applications or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at globalprivacy@sage.com.

10. Transfers outside of Europe

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way.

Our website and some of our applications or services or parts of them may also be hosted in the United States and this means that we may transfer any information which is submitted by you through the website or the application or service outside the European Economic Area (which means all the EU countries plus Norway, Iceland and Liechtenstein) ("EEA") to the United States or to other territories outside of the EEA. When you send an email to us, this will also be stored on our email servers which are hosted in the United States.

We may use service providers based outside of the EEA to help us provide our website, applications and services to you (for example, platform and payment providers who help us deliver our applications and services, or advertising or execute your payments) and this means that we may transfer your information to service providers outside the EEA for the purpose of providing our applications, advertising and services to you.

We take steps to ensure that where your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations. For example, we may share information with our group companies or affiliates based outside the EEA for the purposes envisaged by this privacy notice. All Sage group companies are subject to Sage group data protection policies designed to protect data in accordance with EU data protection laws.

By using our website, products or services or by interacting with us in the ways described in this privacy notice, you consent to the transfer of your information outside the EEA in the circumstances set out in this privacy notice. If you do not want your information to be transferred outside the EEA you should not use our website, applications or services.

11. Other sites and social media

If you follow a link from our website, application or service to another site or service, this notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy policies appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

12. Further information

If you would like further information about data protection, or if you would like to view the register of Data Controllers, you can visit the Information Commissioner's site at www.ico.org.uk.

List of The Sage Group plc group companies as at 30 September 2015

| Company name | Address |
|---|---|
| The Sage Group plc Sage (UK) Limited Sage Global Services Limited Sage Pay Europe Limited Sage Pay (GB) Limited Sage Payments (UK) Limited Sage Holding Company Limited | North Park, Newcastle upon Tyne, England, NE13 9AA |
| Sage Global Services (Ireland) Limited Sage Pay (Dublin) Limited Sage Pay (Ireland) Limited Sage Hibernia Limited Sage Technologies Limited | 3096 Lake Drive, Citywest Business Park, Dublin 24, Ireland |
| Sage Payment Solutions Inc Sage Software Inc Sage Software North America Sage Software Holdings Inc Sage Software Canada Holdings Ltd Sage Software Canada Ltd | Global US Headquarters: 271 17th Street, Suite 1100, Atlanta, GA 30363 1715 N. Brown Rd., Lawrenceville, GA 30043 6561 Irvine Center Drive, Irvine, California 92618 13888 Wireless Way, Suite 120, Richmond, BC V6V 0A3, Canada |
| PAI Services, LLC dba Sage Payroll Solutions | 305 Fellowship Rd, Suite 300, Mt Laurel, NJ North America, 08054 |
| Sage Payment Solutions, Inc | 12120 Sunset Hills, Rd. Suite 500 Reston, VA 20190 |
| Sage Payment Solutions EFT, Inc | 73 Eglin Parkway NE, Suite 30, Fort Walton Beach, Florida 32548 88 Executive Center Dr. West Suite 300, St. Petersburg, FL 33702 |

| Company name | Address |
|--|--|
| Sage Global Services US, Inc | 271 17th Street, Suite 1100, Atlanta, GA 30363 |
| Sage sp z.o.o | Kolejowa 5/7, 01-217 Warsaw, Poland |
| Sage Schweiz AG | Platz 10, CH-6039 Root D4, Switzerland |
| Sage SP, S.L. Sage Formacion S.A. | Calle Labastida, 10, 28034 Madrid, Spain |
| Sage Software GmbH Sage HR Solutions AG Sage bäurer GmbH Sage Personalsoftware und Services GmbH | Emil-von-Behring-Straße 8-14, 60439, Frankfurt am Main, Germany Karl-Heine-Straße 109 - 111, 04229 Leipzig, Germany Josefstraße 10, 78166 Donaueschingen Karl-Hammerschmidt-Str. 40, D-85609 München |
| Sage Portugal-Software, S.A. | Avenida Dom Afonso Henriques, nº1462, 2º andar, Portugal |
| Sage SAS | 10 rue Fructidor, 75017 Paris, France |
| Sage S.A. | Rue Natalis 2, 4020 Liège, Belgium |
| Sage South Africa (Pty) Limited | 102 Western Services Road, Gallo Manor Ext 6, Gallo Manor, Johannesburg, South Africa |
| Sage Pay (Pty) Limited | 2nd Floor, Old Mutual Building, Wesley Street, Strand, 7149, South Africa |
| Sage Software Australia Pty Limited | Level 2, 67 Albert Avenue, Chatswood, NSW, 2067, Australia |