

InforUMobile PRIVACY POLICY

(Last modified 20-02-2019)

For the purpose of this document, "We/ Us" relates to InforUMobile; "Data Subjects" relates to InforUMobile Website Visitors, Account Openers, Users and Customers; "Personal Data" relates to information that can be used to directly or indirectly identify a Data Subjects.

In the course of our business operations and your interaction with our website, we receive, collect and maintain personal data on Data Subjects. We are committed to protecting the privacy of those individuals who have given us their details and whose details we maintain.

Following are the details concerning our handling of Personal Data:

1. The Personal Data collected includes: (i) basic information, such as your name and surname, the company you work for; (ii) contact information, such as your postal address, email address and phone number(s); (iii) financial information, such as payment-related information; (iv) technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically; (v) identification and background information provided by you; or (vii) any other information relating to you which you may provide to us. In respect of this Personal Data InforUMobile is regarded as a Data Controller.
2. We process Personal Data of Data Subjects who submit us their information in a form or otherwise, to assist with queries they may have and offer them our Services by contacting them and sending them marketing information. The said Personal Data may be processed for marketing purposes such as customised and direct marketing, operational purposes, administration notices, invoicing, database management and maintenance, product suggestions and offers, interaction with external social networks, heat mapping, newsletters and more.
3. As well, the Personal Data is processed for the performance of the Agreement between the Data Subject and us, as per our legitimate interests related to the Customer, our business relationship with him/her and in order to comply with legal obligations such as accounting and administration and fulfill our regulatory and risk management obligations. It is hereby emphasized that we are unable to provide the Services to a Data Subjects who refuse the processing of their Personal Data.
4. By using the Service and accepting the terms of this Privacy Policy, Data Subject consents to our use of cookies. To see our cookie policy go to: <https://inforumobile.ie/uFAQs/inforumobile-cookie-policy/>.
5. All information you provide to us is stored on our secure servers or those of our Sub-Processors - see Annex C to the Data Protection Addendum for a list of Sub-Processors.
6. Where Data Subject has chosen or where we have given him/her a password which enables him/her to access any part of our Platform, Data Subject is responsible for keeping this password confidential.
7. We have taken adequate technical and organisational measures in order to keep Personal Data safe and to secure it against unauthorized access, loss, misuse or alteration by third parties, such as encryption, access controls, firewalls, etc. Nevertheless, considering nowadays cyber

threats, we cannot fully guarantee that our security measures will prevent illegally and maliciously operating third parties from obtaining access to Personal Data and the absolute security of that information during its transmission or its storage on our systems.

8. We endeavor keeping Personal Data accurate and up-to-date. As such, Data Subjects are required to update us as soon as possible about any changes to such information.
9. Data Subject has the right to:
 - a. Request from us the update/ rectification/ erasure of the Data Subject's Personal Data.
 - b. Request from us the restriction/objection of processing of information concerning the Data Subject.
 - c. Receive Data Subject's Personal Data as provided to us (not as generated by us), to be delivered to him/her in a commonly used electronic format.

Data Subject may exercise the aforementioned rights (11a. to 11c.) by sending a written request to us at serviceie@inforumobile.com.
 - d. Complain to the DPC if he/she believes we have not handled their Personal Data in accordance with the Data Protection Legislation.
10. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from the transfer of data over communications networks and facilities or failure on the part of any other service provider.
11. Personal Data may be disclosed, when necessary, to authorities and applicable law agents.
12. Personal Data may be transferred to jurisdictions outside the European Union and the European Economic Area ("EU/EEA") subject to appropriate safeguards. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting Data Subject's personal data, he/she consents to this transfer, storing or processing.
13. Personal Data will be kept and stored for such period of time as we deem necessary taking into account the purpose for which it was initially collected.
14. Where we retain information for Service/website 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 Service/website, not to specifically analyse personal characteristics about you.
15. We may continue to process Data Subjects' Personal Data in certain circumstances in accordance with Data Protection Legislation (i.e. where we have a legal justification to continue to hold such Personal Data, such as it being within our legitimate business interest to do so such as retaining evidence of billing information etc.).
16. All contacts and inquiries related to this Privacy Policy are to be addressed by email to serviceie@inforumobile.com.