

## Privacy Policy

We, Wesurance Limited (“Wesurance”) and our corporate affiliates (“we”, “our” or “us”), highly value and respect your privacy. We offer many services to help you to do digital transformation. As part of running those services, we collect data about you and your business. This privacy policy (“Policy”) outlines which information we collect when you (“you” or “your”) access and use the website, platform, mobile application (the “App”), products and services provided by us (which, together, are referred to as the “Services”), and how we protect and use it.

Please take a moment to familiarize yourself with the Policy before using our Services. By accessing or using our Services, you agree to this Policy and to our Terms of Service. If you do not agree to this Policy or Terms of Service, please do not access or otherwise use our Services or any information contained herein.

### **Section 1 - How we collect your data**

Most of the personal data we collect is directly provided by our users when they register and use our services. Other data is collected by recording interactions with our services.

1. **Account & Contact Date:** When you register on our website to use some part of our services, or to subscribe to use our services, or fill in one of our contact forms, we might ask you to provide personal data to us. This typically includes your name, company name, email address and sometimes your phone number, postal address, your business sector and personal password.
2. We never record or store credit card information from our customers, and always rely on trusted third-party PCI-DSS-compliant payment processors for credit card processing, including for recurring payment processing.
3. **IP address and device type:** We collect some information about you automatically when you visit our websites, like your IP address and device type, in order to customise your experience according to your country and preferred language, and also for security purpose.
4. **Databases:** When you subscribe to Wesurance service and create your own DTX account (for example by starting a Free Trial), any information or content you submit or upload into your database is your own, and you control it fully. All data related to your customers is converted into unrecognisable code using industry standard data encryption. Wesurance stores your data securely – and you control who has access. Similarly, when you upload an on-premises database to the DTX platform, you own the data in it. This data will often include personal information, for example: your list of employees, your contacts and customers, your messages, pictures, videos, etc. We only ever collect this information on your behalf, and you always retain ownership and full control on this data.

### **Section 2 - How we use your data**

1. **Account & Contact Data:** We generally process your information when we need to do so to fulfill a contractual obligation (for example, to process your subscription payments to use the services), or where we or someone we work with needs to use your personal

information for a reason related to their business (for example, to provide you with a service). We may also use this information for marketing and communication purposes (our marketing messages always come with a way for you to opt-out at any time). We also use this data in aggregated/anonymised form in order to analyze service trends.

2. **IP address and device type:** This automatically recorded data is anonymously analyzed in order to maintain and improve our services.
3. **Database:** We only collect and process this data on your behalf, in order to perform the services you have subscribed to, and based on the instructions you explicitly gave when you registered or configured your service and your database. Our Helpdesk staff and engineers may access this information in a limited and reasonable manner in order to solve any issue with our services, or at your explicit request for support reasons, or as required by law, or to ensure the security of our services.

### **Section 3 - How we share your data**

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

1. our corporate affiliates;
2. third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you;
3. the payment gateway service providers;
4. regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure ;
5. other people where we have your consent.

### **Section 4 - Your rights over your data**

We believe you should be able to access and control your personal information no matter where you live. You have the right to access, correct, amend, delete, port to another service provider, restrict, or object to certain uses of your personal information. You can do so at any time by contacting us, except when we are required to keep it for legal reasons. We will not charge you more or provide you with a different level of service if you exercise any of these rights.

Please note that if you send us a request relating to your personal information, we have to make sure that it is you before we can respond. In order to do so, we may ask to see documentation verifying your identity, which we will discard after verification. If you are not happy with our response to a request, you can contact us to resolve the issue. You also have the right to contact your local data protection or privacy authority at any time.

For the payment gateway service, if you wish to exercise these rights over information about you, you need to directly contact the payment gateway service provider you interacted with. We are only a processor on their behalf, and cannot decide how to process their information. As such, we

can only forward your request to them to allow them to respond. We will of course help our customers to fulfill these requests by giving them the tools to do so and by answering their questions.

### **Section 5 - Data Retention**

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements). We'll retain your personal data for as long as we have a relationship with you. If you cancel the service your database is kept deactivated for 12 months (the grace period during which you can change your mind), in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

### **Section 6 - International Staff**

In some cases, the personal data mentioned in this Privacy Policy may be accessed by staff members of Wesurance and our corporate affiliates in other countries. Such access will always be done for the same purposes and with the same privacy and security precautions as if it was done by our own local staff, so all the guarantees we provide still apply.

### **Section 7 - Third Party Disclosure**

Except as explicitly mentioned above, we do not sell, trade, or otherwise transfer your personal data to third parties. We may share or disclose aggregated or de-identified information, for research purposes, or to discuss trends or statistics with third-parties. We will only disclose your personal data to regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.

### **Section 8 - Free trials**

If you have elected to buy a paid subscription, you are not eligible for a free trial. To continue using DTX after your free trial expires, you will need to purchase a subscription and enter your payment details in DTX for processing. Features in the free trial edition are limited.

### **Section 9 - Policy Updates**

We may update this Privacy Policy from time to time, in order to clarify it, to reflect any changes to our website, or to comply with legal obligations. No matter what we change, we will always maintain our commitment to protecting your privacy. We will post all revisions, along with their effective dates. We recommend that you check this page every so often to make sure you're familiar with the latest policy. We will ask for your consent to policy changes if required by

applicable law; in other cases, please note that your continued use of the Service after any change means that you agree with, and consent to be bound by, the new Privacy Policy.

### **Section 10 - Security**

We realize how important and sensitive your personal data is, and our teams work tirelessly to protect your information and to ensure the security and integrity of our platform. Our technical, administrative and organizational security measures are described in details in our **Security Policy**.

### **Section 11 - Cookies**

We use third-party services such as Google Analytics, who set and use their own cookies to identify visitors and provide their own contextual services.

### **Section 12 - Contacting Us**

We're always keen to hear from you. As a technology company, we prefer to communicate with you by email. If you have any questions or feedback regarding this Privacy Policy, please contact us at [contact@wesurance.io](mailto:contact@wesurance.io).