

PRIVACY POLICY

1 INTRODUCTION

- 1.1 This privacy policy explains how We protect and use Your Personal Information.
- 1.2 “Personal Information” means “information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person” in terms of the General Data Protection Regulation (2016/679), the Protection of Personal Information Act, 4 of 2013 (“POPIA”) or any applicable legislation,
- 1.3 All definitions contained in the Terms also apply to this privacy policy, unless the context indicates otherwise.

2 CONSENT

By using the Service and/or the Website You consent to Our collection, storage, processing and disclosure of Your Personal Information on the basis set out in this Privacy Policy.

3 INFORMATION WE COLLECT

- 3.1 In Your Use of the Website, we may collect and store internationally the following information and Personal Information:
 - 3.1.1 Your entity name, and entity email address
 - 3.1.2 correspondence via the Website and information relating to transactional activity via the Website;
 - 3.1.3 website connection information, statistics on page views, traffic to and from the Website, IP address and standard web log information;
 - 3.1.4 if you elect to use our Service, information in respect of each invoice. Such information includes: the country of expense; the date of the expense; the value; the expense type; the currency; the billing address; the supplier information (if available); scan or image of the invoice; and the details of the traveller, this could include the traveller’s name and/or allocated reference number.

4 HOW WE USE PERSONAL INFORMATION

- 4.1 At the outset we would like to give You the comfort that You will always own Your Personal Information and that we do not sell Your Personal Information to anyone, for any reason, at any time.
- 4.2 We use, disclose and share Your Personal Information only as follows:
- 4.2.1 to provide the Service;
 - 4.2.2 for marketing purposes;
 - 4.2.3 to analyse website and service usage and to improve the Services and/or Website;
 - 4.2.4 to deliver to You any administrative notices, alerts and communications relevant to Your Use of the Website;
 - 4.2.5 for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
 - 4.2.6 by disclosing Your Personal Information to third party service providers appointed by Us in order to enable Us to provide the Website and Services to You, and who are bound by these same privacy restrictions;
 - 4.2.7 with and to Our other business divisions and other companies within the VAT IT group of companies for the purposes of supporting the Service and the Website, improving the Services, determining any illegal or fraudulent conduct and violations of any group company policies; and/or
 - 4.2.8 as otherwise set out in the Terms.
- 4.3 In addition, We may disclose Personal Information to law enforcement, other government officials, or other third parties as We, in Our sole discretion, believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose Us to legal liability, or in connection with a merger, consolidation, or sale of Our assets.

5 OPT OUT OR UPDATE

- 5.1 You are entitled to opt out of any disclosure of Your Personal Information to a third party or use of Your Personal Information for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by You by emailing Us at confidentialitynotice@vatit.com
- 5.2 In the event that you wish to update your Personal Information please e-mail Us at the aforementioned address.

6 INFORMATION ABOUT OUR USE OF COOKIES

- 6.1 Our Website uses cookies to distinguish You from other users of Our Website. This helps us to provide You with a good experience when You browse Our Website and also allows us to improve Our Website. [By continuing to browse the site, You are agreeing to Our use of cookies.]
- 6.2 A cookie is a small file of letters and numbers that we store on Your browser or the hard drive of Your computer if You agree. Cookies contain information that is transferred to Your computer's hard drive.
- 6.3 We use the following cookies:
- 6.3.1 **Strictly necessary cookies.** These are cookies that are required for the operation of Our Website.
- 6.3.2 **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around Our Website when they are using it. This helps us to improve the way Our Website works, for example, by ensuring that users are finding what they are looking for easily.
- 6.3.3 **Functionality cookies.** These are used to recognise You when You return to Our Website. This enables us to personalise Our content for You, greet You by name and remember Your preferences (for example, Your choice of language or region).
- 6.3.4 **Targeting cookies.** These cookies record Your visit to our Website, the pages You have visited and the links You have followed. We will use this information to make Our Website and the advertising displayed on it more relevant to Your interests. We may also share this information with third parties for this purpose.
- 6.4 If you leave a comment on our site you may opt in to saving your name, email address, and website in cookies. These are for your convenience so that you do

not have to fill in your details again when you leave another comment. These cookies will last for one year.

- 6.5 If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.
- 6.6 When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. If you log out of your account, the login cookies will be removed.
- 6.7 If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

7 RETENTION PERIOD

- 7.1 If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.
- 7.2 For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

8 SECURITY

- 8.1 We take reasonable technical, administrative and physical steps to protect against unauthorised access to and disclosure of Personal Information.
- 8.2 We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of Your online session and to protect Our systems from unauthorised access.
- 8.3 Our databases are protected from general personnel access both physically and logically.

9 LINKS TO OTHER WEBSITES

We may make content from third party websites available to You from links located on the Website. Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. These websites are not subject to the Terms therefore we recommend that You review the Terms of each such website to determine how that website protects Your privacy.

10 COMMENTS AND QUESTIONS

If You have any questions, comments or concerns about the Terms, You may contact Us at confidentialitynotice@vatit.com

Copyright in the Website Privacy Policy vests in VAT IT & Econest

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