GENOVO PRIVACY POLICY

Creanova Limited ("we", "us", "our") is committed to protecting and respecting your privacy.

This privacy policy ("**Privacy Policy**") together with our <u>Cookie Policy</u>, <u>Terms and Conditions</u> and any other documents referred to herein, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us as a data controller, when you use our website or App.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.genovo.co.uk (the "Site") or using https://app.genovo.co.uk (the "App") you are accepting and consenting to the practices described in this Privacy Policy.

If you do not wish to be bound by the terms of this Privacy Policy then you may not use the Site or the App.

Please note:

This Privacy Policy does not apply to data that you provide to us when we process personal data on your behalf as your data processor, i.e. where we process customer data within the App.

DATA CONTROLLER

For the purpose of EU and UK data protection laws and any applicable national implementing laws, regulations and secondary legislation relating to the processing of personal data (together "**Data Protection Law**"), the data controller is Creanova Limited of Suite 8, Sabrina House, Sabrina Court, Longden, Coleham, Shrewsbury, Shropshire, SY3 7BF, England.

LEGAL BASIS FOR THE PROCESSING

We will only use your personal data when the law allows us to. We collect and use the personal data described below in order to provide you with access to our Site and App in a reliable and secure manner. We use your personal data in the following circumstances:

- For our legitimate business interest (or those of a third party) and your interests and fundamental rights do not override those interests.
- To fulfil our contractual obligations to you.
- To comply with our legal obligations.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

PERSONAL DATA WE MAY COLLECT ABOUT YOU

We may collect and process personal data about you. Personal data, or personally identifiable information, means any information about an individual from which that individual can be identified. It does not include data where the identity has been removed (anonymous). We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data**: includes first name, maiden name, last name, username or similar identifier and title.
- Contact Data: includes billing address, email address and telephone numbers.
- Financial Data: includes bank account and payment card details.
- Transaction Data: includes details about payments to and from you and other details
 of products and services you have purchased from us.
- Technical Data: includes internet protocol (IP) address, your login data, browser type
 and version, time zone setting and location, browser plug-in types and versions,
 operating system and platform, and other technology on the devices you use to access
 this Site or the Services.
- Profile Data: includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data: includes information about how you use our Site and App, including the
 full Uniform Resource Locators (URL) clickstream to, through and from our Site and
 App (including date and time); products you viewed or searched for; page response
 times, download errors, length of visits to certain pages, page interaction information
 (such as scrolling, clicks, and mouse-overs), and methods used to browse away from
 the page and any phone number used to call our customer service number.
- Marketing and Communication Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Location Data: We also use GPS technology to determine your current location. Some
 of our location-enabled services require your personal data for the feature to work. If
 you wish to use the particular feature, you will be asked to consent to your data being
 used for this purpose. You can withdraw your consent at any time by disabling Location
 Data in your settings.
- Aggregated Data: We also collect, use and share statistical or demographic data for any purpose. This Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you,

we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

• **Special Category Data**: We do not collect, store or use special category data about you. i.e. details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including via:

- Direct Interactions. You may give us your Identity, Contact and Financial Data when you fill in forms or correspond with us by post, phone, email or otherwise. This includes personal data you provide when you register to use our Site or App or to receive our newsletter, subscribe to use our App, create an account to use our Site or App, request marketing to be sent to you, search for a product or place an order on our Site, participate in discussion boards or other social media functions on our Site or App, enter a competition, promotion or survey, attend a conference or webinar, give us feedback, provide a testimonial about our Site or App, contact us and when you report a problem with our Site or App.
- Purchases: If you make purchases via our Site or within an App, or register for an event or webinar, we may require you to provide your Identity, Contact, Financial and Transaction Data.
- **Community:** If you register for an online community that we provide, we may ask you to provide us with Identity, Contact, Profile and Technical Data.
- Automated Technologies or Interactions. As you interact with our App, Sites or emails, we automatically collect Technical Information about your device, browsing actions, patterns, Location Data and Usage Data. We collect this personal data by using cookies, server logs, web beacons, pixels, and similar technologies about your device, and your use of our Site and App. We may also receive Technical Data and Location Data about you if you visit other websites using our cookies. Please see the Cookie section below for further details.

PERSONAL DATA WE RECEIVE FROM OTHER SOURCES

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive the following personal data about you from them:

- **Technical Data:** from the following analytics providers, advertising networks and search information providers: Google, NetResults.
- Contact, Transaction and Financial Data: from the following providers of payment services: Chargebee, Stripe and GoCardless.
- Identity, Contact Data and Email Communications: from the following providers of chat/communication/helpdesk/webinar services with customers including via email: Freshworks, WebinarNinja.
- Email Communications and Contact Data: from the following providers of email communications service providers: Microsoft, Wildbit.
- Business Contact and Financial Data: from the following CRM service providers who
 manage contacts and keep a record of communications/ interactions with customers:
 Salesforce.
- Contact Data and Financial Data: from our cloud accounting system that stores email and names of persons sent invoices by email: Xero.

PERSONAL DATA WE COLLECT FROM OTHER SOURCES

We also collect personal data about you from publicly available sources. We may combine this information with personal data provided by you. This helps us update, expand, and analyse our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. We also use this for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying Contact Data. The personal data we collect includes:

- Identity and Contact Data: from publicly available sources such as Companies House, Customer's Website.
- **Identity, Contact and Profile Data:** that is published about you on social media profiles: LinkedIn, Facebook, Twitter.

COOKIES

We use cookies on our Site and App to distinguish you from other users of our Site and App. This helps us to provide you with the best experience possible when you browse our Site and use the App. It also allows us to improve the Site and App. For more information about the type of cookies we use and the purposes for which we use them, see our Cookie Policy.

You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or App, or all functionality of the services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

The following links explain how you can control cookies via your browser – remember that if you turn off cookies in your browser then these settings apply to all websites not just this one.

Internet Explorer	http://support.microsoft.com/kb/278835
Edge	https://answers.microsoft.com/en- us/windows/forum/apps_windows_10-msedge/edge-how-do-i-enable- cookies/275b58e3-d741-4b21-8042-3059b1902d0e?auth=1
Chrome	http://support.google.com/chrome/bin/answer.py?hl=en- GB&answer=95647
Safari	http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html
Firefox:	http://support.mozilla.org/en- US/kb/Enabling%20and%20disabling%20cookies
Blackberries	http://docs.blackberry.com/en/smartphone_users/deliverables/32004/ Turn_off_cookies_in_the_browser_60_1072866_11.jsp
Android	http://support.google.com/mobile/bin/answer.py?hl=en&answer=1690 22
iOS	https://support.apple.com/en-gb/HT201265
Opera	http://www.opera.com/browser/tutorials/security/privacy/

DO NOT TRACK

We do not support Do Not Track ("DNT").

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the "Preferences" or "Settings" page of your web browser.

USES MADE OF THE INFORMATION

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one bases has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity(b) Contact(c) Financial(d) Transaction(e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms, this Privacy Policy, the Site or App (b) Asking you to leave a review or take a survey	(a) Identity(b) Contact(c) Profile(d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance,	(a) Identity(b) Contact(c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud

support, updates, reporting and hosting of data)		and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Site and Services content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications(f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site and App, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

We will not sell or rent your personal data to anyone.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURE OF YOUR PERSONAL DATA

Personal data we share with third parties

We may share your personal data with the third parties set out in our Third Party Supplier List (Appendix A) for the purposes set out in the table above. Below is a summary of the types of third parties used:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Business partners, suppliers and sub-contractors for the performance of any contract we
 enter into with them or you to provide services such as IT and system administration
 services, email communications, hosting services, backup services, credit card processing,
 research, development, marketing and customer support services.
- Professional advisers acting as service providers to us in relation to the Site or App including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Tax authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 250 women aged over 25 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, men living in London). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site.
- Credit reference agencies for the purpose of credit risk reduction.

Personal data we disclose to third parties

We may disclose your personal data to third parties:

• In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If Creanova Limited or substantially all of its assets are acquired by a third party, in which
 case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any
 legal obligation, or in order to enforce or apply our <u>Terms and Conditions</u> and/or any other
 agreements; or to protect our rights, property, safety, our customers or others. This includes
 exchanging information with other companies and organisations for the purposes of fraud
 protection and credit risk reduction.
- We may share aggregated data in the normal course of operating our business; for example, with other Site or App users, our customers or publicly to show trends or benchmark the general use of our Site and App.

INTERNATIONAL TRANSFERS

Our Services are global and your information (including personal data) may be stored and processed in any country where we have operations or where we engage service providers to help us provide services to you. This will involve a transfer of your personal data to countries outside of your country of residence, where data protection rules are different from those of your country of residence.

Processing of your personal data will involve a transfer of date to countries outside the European Economic Area ("EEA"), Switzerland or the UK. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or partners. Such staff or subcontractors maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the EEA.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred to a country or organisation that provides an adequate level of protection. For example, where the European Commission or the UK Data Commissioner has determined that a country provides an adequate level of protection, or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission ("Standard Contractual Clauses").

Our Site and App are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site or App from outside the EEA, Switzerland or the UK. This means that where you chose to post your data on our Site or App, it could be accessed from anywhere around the world and therefore a transfer of your personal data outside of the EEA, Switzerland or the UK may be deemed to have occurred.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology and will be passed directly to our PCI compliant payment service provider and never stored on our system. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share any password with anyone. Sharing any passwords will constitute a breach of these terms. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or App. Any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We do encrypt all traffic between the browser and the Site and the App via SSL, which is updated when required.

LINKS TO OTHER WEBSITES

Our Site and App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

USE OF BLOGS, FORUMS AND CHAT ROOMS

Any information that you post to areas of the Site or Services that are viewable by others (for example, to a blog, forum or chat-room) will not be treated as proprietary, private, or confidential. We have no obligation to monitor such posts to the Site or App or to exercise any editorial control over such posts; however, we reserve the right to review such posts and to remove any material that, in our judgment, is not appropriate. Posting, transmitting, promoting, using, distributing or storing content that could subject us to any legal liability, whether in tort or otherwise, or that is in violation of any applicable law or regulation, or otherwise contrary to commonly accepted community standards, is prohibited, including without limitation information and material protected by copyright, trademark, trade secret, nondisclosure or confidentiality agreements, or other intellectual property rights.

YOUR RIGHTS

You have the right under Data Protection Law, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- Withdraw your consent to us processing your personal data, at any time.

You can make a request in relation to any of the above rights by writing to us at the contact address given at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law. Occasionally it could take us longer, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

MARKETING

- Marketing: We may use your Identity, Contact, Technical, Usage and Profile Data to form
 a view on what we think you may want or need, or what may be of interest to you. This is
 how we decide which products, services and offers may be relevant for you (we call this
 marketing).
- Promotional Offers from us: We will send you marketing emails if you "opt in" to receive
 marketing emails when registering on our Site or App, or if you have enquired about, or
 purchased any of our goods or services from us and you have not opted out of receiving
 such marketing.
- Third Party Marketing: We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
- Opt out: Please note that, if you change your mind about being sent marketing emails you can "opt out" at any time by clicking the "unsubscribe" link at the bottom of any marketing Genovo Privacy Policy Version 4 (06/01/2022)

email. Once you "opt out", you will no longer receive any marketing emails from us. We will continue to communicate with you regarding your service billing and support via email and where we send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

DATA RETENTION

We retain personal data for as long as reasonably necessary to fulfil the purposes for which it was provided or collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, if we reasonably believe there is a prospect of litigation in respect to our relationship with you, to comply with law enforcement requests, maintain security, prevent fraud and abuse, resolve disputes, enforce our legal agreements, or fulfil your request to "unsubscribe" from further messages from us.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In respect to any personal data stored in the App for the purpose of providing the Service, this will be retained for as long as you remain subscribed to the Service, or the period set out in any relevant contract you have with us. However, we may keep some data after your account is closed or you cease using the Service.

If you close your account or cease being subscribed to the Service, we usually delete any personal data stored within the App after 30 days of this event. However, we may retain personal data where reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, maintain security, prevent fraud and abuse, resolve disputes, enforce our Terms and Conditions, or fulfil your request to "unsubscribe" from further messages from us.

We will retain de-personalised information after your account has been closed and we may use this for research or statistical purposes, in which case we may use this information indefinitely without further notice to you

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the App. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

COMPLAINTS

Our intention is to meet the highest standards when collecting and using personal data. For this reason, we take complaints we receive very seriously. We encourage users to notify us if they think that our collection or use of personal data is unfair, misleading or inappropriate. If you Genovo Privacy Policy Version 4 (06/01/2022)

have any complaints about our use of your personal data please contact us as set out at the end of this Privacy Policy or contact the following data protection supervisory authority:

For individuals located in the EU: your local data protection supervisory authority in the country in which you are located.

For UK individuals: The Information Commissioner's Office at, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England ("ICO").

AGE OF USERS

This App and Site is not intended for and shall not be used by anyone under the age of 16.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy was last updated on 22nd January 2022 and replaces any other Privacy Policy previously applicable from this date.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

By post: Creanova Limited of Suite 8, Sabrina House, Sabrina Court, Longden, Coleham, Shrewsbury, Shropshire, SY3 7BF, England.

By email: gdpr@genovo.co.uk

Our EU Data Protection Representative is: DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland.

Appendix A: Third Party List

Third Party	Services	Privacy Policy
ChargeBee Inc.	Billing software services	Privacy
Freshworks Inc.(Freshdesk)	Customer support services	Privacy
Google	Analytics	Privacy
GoCardless Ltd	Direct debit payments management services	Privacy
Microsoft Corporation	Microsoft Azure (for storing and processing Genovo main process) and Microsoft 365 for operational and demo support.	Privacy
NetResults	Marketing, Onboarding, Analytics	Privacy
Salesforce	CRM, Account Management	Privacy
Stripe Inc	Payment processing	Privacy
WebinarNinja	Provision of Webinars and related session forums.	Privacy
Wildbit LLC(Postmark)	Transaction emails	Privacy
Xero	Accounts processing	<u>Privacy</u>