

Privacy Notice

1. What we need

Our Personal Data Protection Policy governs the use and storage of your data. You can see our Personal Data Protection Policy at <https://www.riteq.co.uk/privacypolicy>

RITEQ is a Processor of the personal data you (data subject) provide us. We collect the following types of personal data from you:

- **Personal Data:**

We collect, process and/or store personally identifiable data ("Personal Information") from you and a number of sources, primarily to provide products and services to our customers (under contracts with them) and to improve those products and services.

Sometimes we collect such data directly from you when you provide contact and other information to us through the RITEQ website (a "Site"), or when you ask us question, make a comment, request support, or use certain services. In order to provide you with the previously mentioned services we would need to process your personal data, and we will do so with this Privacy Policy. If you provide Personal Information to us electronically, please be informed that such Personal Information may be transferred from your current location to offices and servers of ours located in the Australia and other countries, consistent with applicable law.

We also may obtain such information by recording how you use our products, for example through error reports or other usage data. When you visit a Site, certain Personal Information may be collected by recording how you interact with that Site via cookies or web beacons.

RITEQ, in delivering its workforce management products and services, also processes data provided by our customers about their employees, in order to provide customers with the full benefit of our products and services. Such data is collected under instructions set forth in the contract between RITEQ, as a data processor, and its customers as data controllers. For customers who choose to deploy RITEQ Clocking devices utilising the biometric technology option, the collection of such customer employee data is undertaken and controlled by the customer and may include information derived from finger scans or vein readers used to verify employee identity. Such data consists solely of templates created from mathematical algorithms, not the fingerprints or vein characteristic data, and as a consequence the templates cannot be reversed engineered to form any kind of biometric data about an individual.

- **Financial Data:**

We may collect financial information such as a Tax number, Bank account, pay grades and salaries. This information will be collected directly from the Data Subject or indirectly via the Employer of the Data Subject. This information will be used to provide services required and mentioned in the contract between RITEQ as the Data Processor and its customers as Data Controller.

2. Why we need it

We need your personal data in order to provide customers with the full benefit of our products and services in accordance with the contract between RITEQ and the customers.

- **Personal Data**, to be able to identify the person and process their time and attendance, provide the necessary shifts and schedules, provide management with reports related to the business needs and performance indication.
- **Financial Data**, to calculate the pay and optimise the work and cost to the business.
- **IP addresses and site usage**, for troubleshooting, capacity management and other technical purposes.

3. What we do with it

Your personal data is processed in RITEQ office located in the UK. Hosting and storage of your data takes place in Amazon Web Services Cloud infrastructure which is physically located in the UK.

We will use the Personal Information you provide in a manner that is consistent with this Privacy Policy.

When you visit our Sites, we may use the data in the manner described in Section 2 above. You can use many features of our Sites without providing any Personal Information, however, you may not be able to use certain services.

If you provide Personal Information to us directly in another manner and for a specified reason, we may use the Personal Information in connection with the reason for which it was provided, such as deliver the product or service you requested, answer the question you posed, or diagnose a technical support issue. We may use it to send you product or service notices that may be of importance to you, prevent, detect or investigate illegal or fraudulent activity, or use it as otherwise disclosed to you when you provide the information. We may use this information to contact you in the future to tell you about services we believe will be of interest to you. We will only send you this information if you have expressly opted in to receive it. When we contact you for this purpose, we will give you the opportunity to "opt-out" from receiving further communications or "opt down" to your desired level of communication.

With regard to customer employee data that RITEQ collects in accordance with a customer's instructions as set forth in our customer contract, we will only use that employee data to provide products and services consistent with those customer instructions. If we process customer employee finger scan data via biometric technology, as described above, we will only do so at customer's instruction for customer's employee verification purpose. The customer has the means to permanently destroy such data which RITEQ processes and which may be in the customer's possession once this purpose has been fulfilled, as determined by the customer, or as otherwise required by applicable law, whichever occurs first. The collection, retention and destruction of such data is, at all times, controlled by the customer (as the employer) and any questions or requests with regard to a customer employee's finger scan data must be directed to that employer.

4. What we don't do with your data

RITEQ will not use, share or distribute your Personal Information except:

- i) internally and with its service providers and/or subcontractors as required to deliver its products and services,
 - ii) as otherwise described in the contract between RITEQ and our customer,
 - iii) as required by applicable law,
 - iv) we have your valid consent
 - v) or as otherwise set forth in the subsequent paragraphs of this Section directly below.
- RITEQ does not sell or rent your Personal Information to third parties for promotional purposes.

There are certain circumstances in which we may share your Personal Information with certain third parties without further notice to you, including:

Business Transfers:

As we develop our business, we might sell or buy businesses or assets. In the event of a sale, merger, reorganization, dissolution or similar event relating to all or a portion of our business, assets or a Site, Personal Information may be part of the transferred assets.

Service providers, subcontractors, agents, partners and related third parties:

We sometimes hire other companies to perform certain business-related functions. Examples include mailing information, hosting and/or maintaining databases and processing payments. When we employ another party to perform a service or function, we may need to provide them with access to certain Personal Information. In that event, we only provide them with the information that they need to perform their specific service or function. RITEQ is accountable for any Personal Information that it receives from you and subsequently transfers to a third party, in accordance with GDPR. We remain responsible if a third-party that we engage to process Personal Information on our behalf does so in a manner inconsistent with GDPR, unless we can prove that we are not responsible for the activities or circumstances giving rise to the claim.

We also may share information with third party partners who resell our products and services and/or provide value added services. We may offer solely or jointly with third parties, webinars, white papers, or other services related to our offerings or services. We may share your contact information and product interest in these offering or services with third parties to communicate without you having your written approval.

Legal Requirements:

We may also disclose your Personal Information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend our rights or property, (iii) act in urgent circumstances to protect the personal safety of users of a Site or the public, or (iv) protect against legal liability.

We do not use any of your personal data for any Advertising, Marketing and Research purposes unless you consented.

Exclusion:

This Privacy Policy shall not apply to any unsolicited information you provide to us through our Sites or any other means. This includes, but is not limited to, information posted to any public areas of our Sites, such as RITEQ Community, bulletin boards, any ideas for new products or modifications to existing services, and other unsolicited submissions including all User Content as that term is defined in our applicable Terms of Use (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution. Please also note that any Personal Information or other information you provide to be displayed in your publicly available online profile, or post in any Site forums will be displayed for others to see and thus will not be subject to the terms of this Privacy Policy. We cannot and will not be responsible for what third parties do with any Personal Information or other information that you choose to make publicly available. As such, we advise that you exercise great care in determining what Personal Information or other information you choose to make publicly available.

Children's Data:

We do not knowingly collect Personal Information from children under the age of 13. If you are under thirteen, please do not submit any Personal Information to RITEQ. If you have reason to believe that a child under the age of 13 has provided Personal Information to RITEQ, please contact us, and we will endeavour to delete that information from our databases in 72 hours.

5. How long we keep it

We would process the personal data for the entire period necessary to achieve the purposes for which it was collected. Once is no longer needed of the purposes for which is collected your personal data would be irreversibly destroyed unless otherwise provided by legal requirements in force.

6. What are your rights?

Employees of RITEQs' customers should contact the appropriate person within their employer's organization with whom they have a business relationship to understand, access, change and/or control what employee information is provided by the employer to RITEQ so that RITEQ may deliver its products and services to the employer.

RITEQ takes reasonable measures to assure itself that RITEQ job applicant and RITEQ employee information in its possession is accurate. Job applicants and employees of RITEQ should reach out to their RITEQ recruiter or human resources contact, as applicable, to understand, access, change and/or control Personal Information that has been provided to RITEQ in the job application or employment context.

Should the Data Controllers believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted. Please contact us

through "Data Subject Access Request Form.pdf" attached to this document, or can be accessed at <https://www.riteq.co.uk/RequestForm>.

In the event that you wish to complain about how we have handled your personal data, please contact Data Protection Officer at The dpo@riteq.co.uk or in writing at RITEQ Limited, 20 Procter Street, London, WC1V 6NX Our DPO or one of his nominees will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the UK Information Commissioner's Office and file a complaint with them.

7. Link to other websites

Our Sites may frame or contain references or links to other websites not owned, operated or controlled by RITEQ, and their privacy policies may differ from ours (the "External Sites"). RITEQ is not responsible for the privacy policies and procedures of External Sites and the privacy policies and procedures we describe here do not apply to External Sites. We recommend that you read and understand the privacy policies of External Sites.

8. Security

We take commercially reasonable steps to protect the Personal Information provided to RITEQ from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from RITEQ may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Information to us or our service providers electronically. Users of our Sites and online services are responsible for maintaining the security of their passwords, user name or ID or other form of authentication needed to access to secure areas or services. We may suspend your access to a Site or one of our services, without notice and pending our investigation if a security breach is suspected.

For web applications where you create a restart code and password, it is solely your responsibility to maintain the confidentiality of your password. You are entirely responsible for any and all activities that occur under your account. RITEQ will not be liable for any loss that you may incur as a result of someone else having used your password, either with or without your knowledge. You could be held liable for losses incurred by RITEQ due to someone else having used your password. You may not use anyone else's password at any time. RITEQ is not responsible for data which is lost or altered or for any data which you enter and submit to employers.

9. Changes to Our Privacy Notice

At times it may be necessary for us to make changes to this Privacy Policy. Accordingly, we reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Information to us. Your continued disclosure of Personal Information to us after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

10. Contacting Us

You may contact us in the event you have questions about this Privacy Policy or our information practices, or if you have a question concerning the handling of your Personal Information, at: dpo@riteq.co.uk, or by postal mail sent to Data Protection Officer, RITEQ Limited, 20 Procter Street, London WC1V 6NX.