

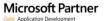
DOCUMENT AUTOMATION SOFTWARE

COMPANY DATA PROTECTION POLICY 2019

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Policy brief & purpose

Our **Company Data Protection Policy** refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Scope

This policy refers to all parties (employees, customers, suppliers) who provide any information to us.

Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

Policy elements

As part of our operations and only at the request of clients, we may need to obtain and process information. This information may include any offline or online data that makes a person or Company identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers and/or financial data and confidential information.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs if for any reason we collect this information, however it is unlikely ActiveDocs will collect private individual data apart from employees. If for any reason we do then we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data



- Inform people about who has access to their information
- · Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

Actions

To exercise data protection we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Ensure employees maintain online privacy and security measures
- Build and maintain secure networks to protect online data from cyberattacks
- Report privacy breaches or data misuse
- Include and / or communicate statements on how we handle data
- Establish data protection practices.
- Once a client chooses to cease being supported under our Software Assurance Program then as
 per the terms and conditions of that Program ActiveDocs will delete all records and data relevant
 to that Client from our servers after 90 days.

Our data protection provisions will appear on our website.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.