

PRIVACY POLICY:

This Privacy Policy (“**Privacy Policy**”) describes the Company's policies and procedures on the collection, use and disclosure of your information when you use our Services or the Software. We will not use or share your information with anyone except as described in this Privacy Policy.

This Privacy Policy is a part of and incorporated within and is to be read along with the Terms of Service (“**TOS**”). The capitalized terms used in this Privacy Policy, but not defined herein, shall have the meaning given to such terms in the Terms.

OUR COMMITMENT TO PRIVACY:

We recognize that your privacy is very important and take it seriously. We ask only for information strictly material to or relevant to your use of the Services. We endeavour to be transparent to our Users about the information we have on them and allow them to opt-out of engagements that call for collection of data. The goal of this Privacy Policy is to give our Users clear information about the information we collect on our users, how we will use such information and more importantly, how we will not use this information. We have attempted to keep the language simple and precise. In case you need any clarifications about the scope or contents of this Privacy Policy, please email via “Contact us” on the website.

SCOPE AND STRUCTURE OF THIS PRIVACY POLICY:

This Privacy Policy applies to our expense management products, Solo Expenses (“**Solo**”). It also applies to the products and services provided by us through these websites and our mobile applications.

This Privacy Policy will cover the how we collect and use information about website visitors, potential customers, users of our products and services, and others who contact us through forms or email addresses published on or linked to our websites; how we handle data that you entrust us when you use our products and services, or when you share any personal or confidential information with us while requesting customer support and other related information.

INFORMATION WE MAY COLLECT AND CONTROL

We collect information about you only if we need the information for some legitimate purpose. We will have information about you only if (a) you have provided the information yourself, (b) we have automatically collected the information; or (c) we have obtained the information from a third party. Accordingly, we may collect and process the following data about you:

- **Information you give us.** You may give us information about yourself by filling in the details under account information, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use the mobile application, subscribe to our Services, search for a Service, use our Services, post Content (e.g., photos, comments, and other materials), [participate in promotional events, your payment information when you buy something from us (such as credit card information or other payment account information), testimonials for the service you have authorised us to post in public forums, and when you report a problem with the Software. The information you give us may include your name, picture, address, e-mail address and phone number, personal description, photograph, location details or payment information]. You may also choose to provide other personal information in order to express yourself beyond the required information, such as a short biography, your location, your website, or a picture.
- **Information we collect about you.** With regard to each of your visit to the Sites or use of the Services, we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) click stream to, through and from the Sites (including date and time); material or information that 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.

- If you use your account information with Facebook, Twitter, Google Plus or Gmail or any other social networking or similar site (collectively, “SNS”) to sign in to the App, an option of which may be provided by the Service to you at its sole discretion, we will collect and store your SNS user ID, and other account information and other information freely made available to the Company by the SNS. The Account Information that is collected includes all the account information provided by you to us. Please be aware that the other information we obtain from the SNS is often dependent on their privacy policies and/or on your settings regarding what information you have consented to share with services like us.
- **Information we receive from other sources.** We may receive information about you from third parties we work closely with (including, for example, business partners, sub-contractors in technical, advertising networks, analytics providers, search information providers) and may receive information about you from such sources. We collect non-personally-identifiable information from the Site or mobile application visitors to track the total of number of visitors accessing our Services, in aggregate form and identify the type of Internet web browser (e.g., Internet Explorer®) and operating system (e.g., Windows®) used by the visitor. This information allows us continuously to improve our Services. We also collect some basic information when you interact or engage with us on social media sites such as Facebook, Twitter, Google+ through posts, comments, questions and other interactions. Such publicly available information, collected by us would allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. However the use of the data is governed by this Privacy Policy.
- **Device information.**
We collect information from or about the computers, phones, or other devices where you install or access our Services, depending on the permissions you’ve granted. We may associate the information we collect from your different devices, which helps us provide consistent Services across your devices. Here are some examples of the device information we collect:
 - Attributes such as the operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers.
 - Device locations, including specific geographic locations, such as through GPS, Bluetooth, or WiFi signals.
 - Connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.
- **Metadata.** Metadata is usually technical data associated with Content you submit, post or share while using our Services. Users can add or may have metadata added to their Content including geolocation, date, attribution, or other data.
- **Cookies.** Our Services use cookies to distinguish you from other users of our Services. This helps us to provide you with a good experience when you use our Services and also allows us to improve the Services. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy on the website.

USES OF YOUR INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to enhance the security of the App;
 - to personalise content;
 - to remember information to help you efficiently access your account;
 - to provide you with information about other services we offer that are similar to those that you are already using or have enquired about;
 - to provide you, or permit selected third parties to provide you, with information about services we feel may interest you. If you are a registered user, we will only contact you by electronic means (e-mail or SMS) with

information about services similar to the Services. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

- to notify you about changes to our Services;
- to ensure that content of the Service, on all our mediums, is presented in the most effective manner for you and for your computer;
- to send you Service-related notices. We may also use your contact information to send you marketing email messages. If you do not want to receive such messages, you may opt out by following the instructions in the message. In order to verify that the e-mail address provided by you belongs to you, we will send you a verification e-mail. Once, the verification process is complete, your Account will be fully functional.
- **Information we collect about you.** We will use this information:
 - to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Services to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our Services, if any, when you choose to do so;
 - as part of our efforts to keep our Services safe and secure and to prevent any fraudulent activity;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our Services about further or other services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

LEGAL BASES FOR COLLECTING AND USING INFORMATION

- **Legal processing bases applicable to us:** If you are an individual from the European Economic Area (EEA), our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more of our legitimate interests or a third party that are not overridden by your data protection interests, (iii) your consent, or (iv) compliance with legal obligation or public interest. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.
- **Withdrawal of consent:** Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.
- **Legitimate interests notice:** Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

YOUR CHOICE IN INFORMATION USE

- You may opt out of receiving non-essential messages by using the 'unsubscribe' function. However, you will continue to receive notices and essential transactional emails.
- You can disable browser cookies, however, if you do so, you may not be able to use certain features of the Services properly.
- You can choose not to provide optional profile information and even delete it or modify it, per your requirements. You can always choose not to fill in non-mandatory fields when you submit any form originating from our Services.

YOUR RIGHTS WITH RESPECT TO INFORMATION WE HOLD ABOUT YOU AS A CONTROLLER:

If you are in the European Economic Area (EEA), you have the following rights with respect to information that we hold about you. We undertake to provide you the same rights no matter where you choose to live.

- **Access:** You have the right to access (and obtain a copy of, if required) of the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.
- **Rectification:** You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
- **Erasure:** You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- **Restriction of processing:** You have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability:** You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
- **Object:** You have the right to object to the use of your information in certain circumstances. You may write to us at "Contact us" on the website.
- **Complain:** You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country. However, you can write to us at the first instance, for such complaints at "Contact us" on the website.
- You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time via "Contact us" on the website.

The Service mediums 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.

RETENTION OF INFORMATION

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

DISCLOSURE OF YOUR INFORMATION

We will never share any content, that belongs to you, unless we have due permission from you. We will never rent or sell your personal information to third parties, except on an anonymized basis, to the following, amongst other, parties:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Advertisers and advertising networks that require the data to select and serve relevant targeted advertisements to you, that they believe will be of most interest to you.

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 any given number of women in a specified age group 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. We may disclose your personal information to third parties for the following purposes:

- 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 the Company 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 TOS and other agreements; or to protect the rights, property, or safety of the Company, 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 your personal information with any member of our Group. The term “Group” includes and means, any entity that is controlled by persons controlling us, or any entity that controls us, or any entity that is under common control with us, whether directly or indirectly and such party will not be declared as a third-party. This also includes such third-party providers that perform essential functions on our behalf, and some data may be shared with them, to provide you the Services, as contracted.

Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service information and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

WHERE WE STORE YOUR PERSONAL DATA

Personal data refers to data, whether true or not, about an individual: (i) who can be identified from that data; or (ii) from that data and other information to which we have or are likely to have access. All information you provide to us is stored on our secure servers (Please view our **Security** information on the website). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

The personal data being provided by you is necessary to enter into a contract with us, and wherever it is optional, it is stated as non-mandatory, in which case you have the right to not provide it. Once your personal data is with us, it will be transmitted through encrypted channels. Although, the transmission of information via the internet is not completely secure at all times, we will do our best to protect your personal data. We, however, do not take any guarantee for the security of your data transmitted; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

If you come across any abuse or violation of this Privacy Policy, please report to support@expenseondemand.com.