

Privacy Policy

Sublime Streamlines' privacy policy.

Privacy Policy

Streamline is a provider of back office processing services and products.

These services include cloud and managed services such as infrastructure support, call centre services and business processing outsourced services, including bespoke software development. Our products are, PlusOne accounts payable automation, Indeks a document management system, Ripple a support engagement platform and Equals an Accounts Receivable automation system.

Streamline is fully committed to ensuring the proper, open and transparent management and use of all personal information and/or data it collects and handles complies with applicable privacy laws. This privacy policy applies only to external personal information and/or data provided by clients, suppliers and other external third parties that streamline interacts with.

This Privacy Policy (Policy) applies to all of streamlines entities and its affiliated entities in countries in which streamline operates and subject to the applicable privacy laws in the jurisdiction where the entity operates. It sets out streamline's policy on the management of personal information and/or data that it may receive or collect.

Personal information and personal data for the purpose of this policy is defined as “any sort of information or an opinion about an individual, whether true or not” (referred to collectively as “Personal Information”).

A sub-category of Personal Information is sensitive information and data. For the purposes of this policy, sensitive information and data includes information of a particularly sensitive nature, such as information relating to an individual’s health, racial or ethnic origins, political opinions, membership of a trade union or political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences or criminal record.

1 WHAT PERSONAL INFORMATION DOES STREAMLINE COLLECT, FROM WHOM AND FOR WHAT PURPOSE?

Streamline will only collect Personal Information that is necessary for its functions and activities. It will only collect Personal Information by lawful means. Streamline collects and holds different categories of information depending on the services being provided and the jurisdiction in which those services are being provided. The following types of Personal Information may be collected:

a) Information about streamline’s Contractors and Suppliers

Streamline collects, directly from our contractors and suppliers, Personal Information about our contractors and suppliers. This Personal Information includes their name and contact details which allows them to be contacted. For workplace health and safety reasons we may also collect from contractors certain Sensitive Information with consent; for example, medical information a contractor has provided us about any injuries he

or she may currently suffer.

From third parties, we may also collect feedback and information relating to our contractors and suppliers' performance of services for streamline. This information is collected for the purposes of monitoring our contractors and suppliers' performance of services and to ensure that we are able to provide the highest quality products and services to our customers.

b) Information about job applicants

Applicants for a position at streamline will be asked to supply details relevant to the job application such as name, contact details, information contained in CVs, driver's licence or passport. We may also collect from third parties identified as referees Personal Information relating to the applicant. This information is used for the purposes of determining suitability for the vacant role.

c) Information about customers and their employees and customers

Personal Information may be collected from customers such as name, contact details, bank account and credit card details.

All customer Personal Information collected by streamline is used for our business functions and activities. These include:

- for billing purposes and order fulfilment;
- to contact customers about our provision of services;
- to maintain account details;
- to provide technical support e.g. account creation, password reset;
- to provide information on request about our products and

services;

- to simplify and personalise the customer experience while dealing with streamline;
- to undertake customer satisfaction surveys and to tailor streamline information, services or products in order to improve and enhance those services and products provided to our customers.

Streamline may also collect from its customers Personal Information relating to its employees and customers. This Personal Information is used so that we can facilitate provision of the services our customers have requested.

Occasionally, streamline uses aggregated Personal Information derived from use of our products and services to provide streamline with anonymous demographic and customer usage information. This information does not identify individuals. This anonymous, aggregated information is used to improve streamline services and products.

2 QUALITY OF PERSONAL INFORMATION

Streamline will ensure, to the extent reasonably possible, that Personal Information collected, used or disclosed is accurate, up-to-date, complete and relevant. If streamline becomes aware that any of the Personal Information it holds is inaccurate it will take prompt steps to update its records so that those records are correct.

3 DATA SECURITY

Streamline takes active measures to ensure the security of Personal Information it holds is protected from misuse, interference, loss and unauthorised access, modification or disclosure.

All Personal Information is stored at secure premises using good quality security protocols.

Streamline security systems are regularly reviewed and updated to maintain the integrity of the streamline security posture.

4 ACCESS AND CORRECTION OF PERSONAL INFORMATION

Subject to verification of identity, any Personal Information held about an individual may be accessed, updated or corrected by application to the streamline Privacy Officer.

There is generally no fee for an individual to make a request or to be provided access to his or her Personal Information. However, depending on the complexity of the request a reasonable processing fee may be charged in some cases.

Streamline will endeavour to respond to access and correction of Personal Information within 15 business days after a written request is received by the streamline Privacy Officer.

5 DIRECT MARKETING

Streamline will only engage in direct marketing practices in accordance with the laws of the relevant country or jurisdiction. At any time an individual or organisation may contact streamline to request that they no longer receive any marketing material or information from streamline.

For email communications, streamline also provides a simple opt-out (unsubscribe) mechanism that individuals can easily submit at any time.

6 DISCLOSURE AND RETENTION OF PERSONAL INFORMATION

As part of providing services to a customer, streamline may disclose Personal Information to third party suppliers and contractors of services.

Streamline may disclose some Personal Information to its affiliated entities in countries in which streamline operates for the purposes of providing services to our customers, including technical support. Such disclosure is subject to the privacy laws applicable in the jurisdiction where that affiliated entity is located.

As a provider and user of cloud services, streamline retains Personal Information on servers that may be located in a number of overseas countries. Streamline will take all reasonable steps to ensure that no person or entity, breaches any relevant privacy laws.

Streamline only retains Personal Information for as long as required by law and needed for our business functions and activities. It is then securely destroyed.

7 WEBSITE BROWSING

Accessing streamline's websites will result in some information being logged including the time of access, IP address and the pages that have been viewed or accessed.

Streamline's websites may contain links to external websites.

Streamline is not responsible for the content or privacy policies that govern such external websites.

8 PRIVACY ISSUES

Any questions about this Policy or to raise any issues about privacy within streamline should be directed to the Streamline Privacy Officer.

Email: Privacy.Officer@sublimegroup.net

Due to the nature of the services that streamline provides, in most situations it will be impracticable for an individual to deal with us on an anonymous basis. However, streamline will consider requests on a case by case basis.

If you are not satisfied with streamline's response and the issue relates to a privacy concern or alleged breach by one of streamline's affiliates, you may take your complaint to the relevant government authority responsible for Privacy.

Policy Approval

C A Pellett
Chief Executive Officer

Policy Owner