

## Privacy Policy

Ultima Business Solutions Limited and its subsidiary Ultima Business Solutions South Africa Proprietary Limited (together “Ultima”, “we”, “us”, “our” in this privacy policy) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our websites (regardless of where you visit them from) and will tell you about your privacy rights and how the law protects you.

### 1. Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of our websites<sup>1</sup>, including any data you may provide through the websites when you sign up to our newsletter, use our online services or portals, purchase products and services from us and or apply for a job with Ultima.

Our websites are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them. If you are an employee of Ultima, please refer to the privacy policy on the intranet.

If you are a potential candidate applying for jobs or assignments with us, please see section 4.

### 2. Controller

We are the controller and are responsible for your personal data.

We are made up of different legal entities. This privacy policy is issued on behalf of our group so when we mention “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in our Group responsible for processing your data. We are the controller and responsible for our websites.

#### 2.1. Ultima’s Data Protection Team

We have a Data Protection Team, including a Data Protection Officer, who are responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Team using the details set out below.

Email address: [dataprotection@Ultima.com](mailto:dataprotection@Ultima.com)

Postal address: Ultima Business Solutions Limited, Gainsborough House, Manor Park, Basingstoke Road, Reading, Berkshire, RG2 0NA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 3. General

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<sup>1</sup> Including but not limited to <https://knowledgelab.training>, <https://antiphish.training/> and <https://www.ultima.com>

## 3.1. Information We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may 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, job title, occupation, employer, or similar identifier.
- **Contact Data** includes email address and telephone numbers, mobile phone numbers or other business telephone numbers provided.
- **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 the website(s).
- **Profile Data** includes your username and password, preferences, feedback and survey responses (particularly if you access one of our portal sites).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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.

Apart from in relation to recruitment activities (see below), we do not collect any **Special Categories of Personal Data** about you (this includes 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). Nor do we collect any information about criminal convictions and offences, unless you apply for a job with Ultima.

### 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 our services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
  - apply for our products or services;
  - create an account on our website(s) or portals;
  - subscribe to our service or publications;
  - request marketing to be sent to you;

- enter a competition, promotion or survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website(s) or portals, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below
  - Technical Data from the following parties:
    - (a) analytics providers such as Google, LinkedIn and Cyfe, based outside the UK;
    - (b) advertising networks such as Google Search and Display network as well as LinkedIn, based outside the UK; and
    - (c) search information providers such as Google and Bing, based outside the UK.
  - Identity and Contact Data from data brokers or aggregators based inside the UK. We occasionally purchase lists of IT contacts from an approved data supplier. The data supplier only passes on the details of recipients who have consented to their details being passed on to technology service businesses, such as us.
  - Identity and Contact Data from publicly available sources such as Companies House.

### 3.2. How we use personal information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation;
- Where we need to manage our relationship with you, as our customer;
- Where we need to provide general customer services;
- To provide information about the services we offer, including invitations to events we hold periodically;
- To ensure that content from our website(s) is presented in the most effective manner for you and for your computer;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or where we have a legitimate interest for contacting you;
- To allow us to tailor our website(s) to the needs of our clients;
- For marketing purposes;
- To allow you to participate in interactive features of our service, when you choose to do so; and
- To notify you about changes to our service.

### Change of purpose

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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

### **3.3. Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

If you are not our customer your details will be included on our database for one of the following reasons:

- You have enquired about a specific product via a manufacturer and they have passed your details to us in order that your enquiry may be followed up.
- Event registration/attendance. You have provided your details when registering for one of our seminars, or you have provided your details when visiting us at a conference/exhibition.

If you do not wish to continue to receive emails from us please let us know by emailing [marketingteam@ultima.com](mailto:marketingteam@ultima.com) or visit our communication preferences page. We do not knowingly undertake “spamming” activities of any kind and we work only with business partners who we believe have similar anti-spamming policies.

You can update your email communication preferences at any time. Please visit our Update Email Preferences page.

### **3.4. Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website(s) and checking or unchecking relevant boxes to adjust your marketing preferences. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **3.5. Third-party links**

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control, and we are not responsible for, the content or privacy and security practices and policies of any third parties. You should review the applicable privacy statements of such third-party links, and you should contact such third parties directly to respond to your questions in respect of such third party links.

### **3.6. Sharing personal information**

We may share your personal data with the parties set out below for the purposes set out above:

- Internal third parties;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens

to our business, then the new owners may use your personal data in the same way as set out in this privacy policy;

- 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 website terms of use and other agreements; or
- to protect the rights, property, or safety of us, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In addition, in order to provide products / services to our customers, it is sometimes necessary for us to work with a third party or parties (the Partner) that may operate within the UK or globally and provide them with Identity and Contact Data. Under the terms of the data protection laws of both you, the Customer, and your agents together with those of our employees and agents, such information will be restricted to the minimum amount necessary to provide the products and/or services.

Any information or access to such information will be provided as part of the goods and services being procured.

The third party or parties may use the Identity and Contact Data for the delivery/promotion/marketing of the products / services supplied. They may hold the information in their databases located outside the UK and the Identity and Contact Data may be used, processed and/or transferred to the United States or other countries located outside of the UK.

By providing us with Identity and Contact Data, you, shall indemnify us against any claims, actions, liabilities, losses, fines, penalties, costs and expenses arising out of the provision of such Identity and Contact Data and any other personal data you provide for the purposes.

If we are acting as a Data Processor to your organisation as part of a services agreement, matters in relation to data protection shall be set out in the services agreement or if applicable a separate data processing agreement.

If the information that you provide to us is for purposes of our business partners providing a service to you (where we act as an intermediary and do not provide the services directly), then you consent to us providing the relevant business partner with that information. The use of that information may be set out in the relevant business partner's privacy statement or as described in the relevant terms and conditions or product terms. We expect all third parties to respect the security of your personal data and to treat it in accordance with the law, not to use your personal data for their own purposes and only process your personal data for specified purposes and in accordance with our instructions.

### **3.7. International transfers**

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it:

- Where your personal data is processed by Ultima group companies, or any of our third party service providers outside of the UK, we have appropriate safeguards (including Standard Contractual Clauses and Intragroup Data Protection Agreements), as required by UK data protection laws, for the processing of personal data by the applicable Ultima group company and its respective employees or the applicable third party service provider.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

### **3.8. Cookies**

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of our website(s) may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

### **3.9. Where we store your personal data and data security**

We may process and store personal data, that you provide to us, on our internal and external third party hosted systems. Personal data that you provide to us shall be stored on systems in accordance with our internal Information Security Management System policies and applicable law.

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. 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 suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **3.10. Your legal rights**

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 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 by contacting us at [marketingteam@ultima.com](mailto:marketingteam@ultima.com).

You also have the following rights in relation to your personal data, the right:

- to access - You have the right to ask us for copies of your personal information.
- to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see ICO contact information to request information on these rights.

#### **No fee usually required**

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 may refuse to comply with your request in these circumstances.

#### **What we may need from you**

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.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month 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.

### **3.11. How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, 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 or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

### **3.12. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review and may amend this from time to time, so please be sure to check back periodically.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **4. Recruitment**

This supplemental section 4 relates to individuals applying for jobs or assignments with us only. It notifies candidates about the personal data that we propose to hold relating to them, how they can expect their personal data to be used and for what purposes.

### **4.1. Information we collect**

You can visit the recruitment section in your region on our website and search for jobs without providing personal information: [Join the team - Ultima](#). However, we do collect certain information automatically from your device when you visit our website, as outlined in this privacy policy. For further information, please see [Cookies - Ultima](#).

We collect and process personal data of job applicants when you apply for a role. The types of information we may collect include:

- Personal identification information (e.g., name, address, date of birth, contact details);
- Employment history details (e.g., job title, salary, pension and benefits);
- Recruitment information (including Right to Work documents, visa information, references and CV);
- Background information, such as training, qualifications and references;
- CCTV and photographic images;
- Financial check output;
- Job related competency test results; and

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- Any information you provide to us as part of your curriculum vitae, any covering correspondence and your interviews with us.

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Racial or ethnic origin;
- DBS check results, pertaining to any criminal Record status and other security clearance programs;
- Health and medical information (as disclosed by the employee and or if required for health and safety purposes or employee benefits).

## **4.2. How we use personal information**

We use the collected personal information for the following purposes:

- Assessing your skills, qualifications and background for a particular role;
- Verifying your information;
- Carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it;
- Company improvement initiatives;
- Compliance with legal and regulatory obligations;
- Internal record keeping.

If you are accepted for a role by Ultima, the information collected during the recruitment process will be used to assist with the process of on-boarding (including establishing systems access and preparing for induction), will form part of your ongoing staff member record and will be processed in accordance with our Staff Privacy Notice (Internal Document).

## **4.3. Sharing Personal Information**

Your information will be shared internally for the purposes of the recruitment exercise only to those Ultima staff members who require such access to perform their tasks and duties. This includes members of the People and Talent team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. As a global corporate group, some data may be shared with group entities outside of the geographic location in which you reside, in accordance with section 3.7 of this privacy policy.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We may then share your data with former employers to obtain references for you, our employment background check provider to obtain necessary background checks, including a criminal record check and our credit reference agency. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with the relevant contract and applicable laws.

## **4.4. Data Security**

We take reasonable measures to protect personal information against unauthorised access, disclosure, alteration, or destruction. We maintain appropriate technical, administrative, and physical safeguards to protect the confidentiality and integrity of personal information, as required by applicable laws.

## **4.5. Rights and Choices**



Job applicants have certain rights regarding their personal information, including the right to:

- Access and obtain a copy of their personal information;
- Correct or update any inaccurate or incomplete personal information;
- Object to, or otherwise request the restriction of, the processing of their personal information under certain circumstances;
- Request the deletion of their personal information, subject to legal requirements;
- Withdraw consent, where applicable;
- Lodge a complaint with the appropriate data protection authority.

#### 4.6. Retention of Personal Information

We will retain your personal information in line with our Retention Policy so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

#### 4.7. Lawful Basis of Processing Recruitment Data

The legal basis for Ultima to process job applicant data shall be **Consent**, in accordance with Article 6 (1)(a), of the UK GDPR.

This shall include the information contained in section 4.1 of this privacy policy. Where Article 9 of the UK GDPR applies (Sensitive Category or special category data, referred to in section 4.1 of this privacy policy), then **Explicit Consent** shall be obtained, for Ultima to process such sensitive category data.

## 5. Use of ‘Knowledge Lab’ Platform

### 5.1. Knowledge Lab supplemental terms

The Knowledge Lab site (the “Site”) is operated by Ultima Business Solutions Limited. This section 5 of the privacy policy sets out additional terms that are applicable for visitors and users of the Site only.

### 5.2. Information We Collect

- **Comments** When visitors leave comments on the Site, we collect the data shown in the comments form, and also the visitor’s IP address and browser user agent string to help spam detection.

An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

- **Media** Visitors to the Site can download and extract any location data from images on the Site. If you upload images to the Site, you should avoid uploading images with embedded location data (EXIF GPS) included.
- **Contact Forms** We will collate information provided via our Site contact forms.
- **Cookies** If you leave a comment on our Site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

### 5.3. How we use personal information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data provided to the Site in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where we need to manage our relationship with you, as our customer;
- Where we need to provide general customer services;
- To allow us to tailor our Site to the needs of our clients;
- To allow you to participate in interactive features of our service, when you choose to do so; and
- To ensure Site security, visitor comments may be checked through an automated spam detection service.

### 5.4. Retention of Personal Information

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on the Site (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

## 6. Use of ‘AntiPhish’ Platform

### 6.1. AntiPhish additional terms

The AntiPhish site (the “AP Site”) is operated by Ultima Business Solutions Limited. This section 6 contains additional terms that are applicable for visitors and users of AP Site only.

### 6.2. Information We Collect for the AP Site

- **Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.
- The other personal information that we collect will also depends on the context of your interactions with the AP Site and the choices you make and the products and features you use. The personal information we collect on the AP site can also include the following: Name and Contact Data. We collect your first and last name, email address, postal address, phone number, and other similar contact data.