

PRIVACY POLICY

This Privacy Policy applies to our customers in the United Kingdom.

Reckon is committed to maintaining the privacy and security of your personal data and to complying with its obligations under data protection legislation in Australia and the UK, including the General Data Protection Regulation 2016/679 (“**GDPR**”).

This Privacy Policy applies to any processing of personal data by us. To use our products and services (the “**Services**”) you must agree to our Privacy Policy.

This Privacy Policy applies to each of the companies in the Reckon Group, including Reckon Limited and its subsidiaries in Australia and overseas and Reckon One Limited in the United Kingdom.

This policy can also be viewed on our website www.reckon.com/uk/policies/privacy.

Summary

Key elements of our Privacy Policy are as follows (but please read it in its entirety):

- **We will only process your personal data (and that of your clients/customers) as required to enable us to provide the Services or as you allow us to.**
- **We host the Services in Australia therefore your personal data will be exported to our Australian operators.**
- **In Australia we use third parties to host the Services.**
- **We will comply with United Kingdom and European data protection laws.**

Please familiarise yourself with the rest of our Privacy Policy to understand:

- [the purposes for which we collect, hold, use and disclose your personal data and what happens if we don't collect this information;](#)
- [how, when and for how long we may collect and hold your personal data;](#)
- [the types of information we collect and hold;](#)
- [the limited circumstances where we are likely to disclose information to overseas recipients and in which countries they are located;](#) and
- [how you can contact us to access or correct personal data which we hold about you or complain about our collection, handling or disclosure of your information.](#)

Purpose

We only collect and process the personal data we need to provide the Services to you or as you have agreed. You are entitled at any time to ask us not to process your personal data but this may result in us being unable to provide the Services.

Essential data: We collect this personal data for:

- registering or activating one or more of the Services;
- enabling external services (such as payment and banking services);
- verifying and authenticating your purchase, initially and then during your period of use of the Services, or where you may have changed details of the computer you are using with the Services;

- obtaining credit references and conducting client identity checks;
- providing installation key codes, access codes or other related access details;
- invoicing and contract management;
- managing our business relationship;
- refunds and dealing with warranty issues; and
- providing technical support, assistance, consulting services and training.

Optional data: We may also collect this personal data to:

- promote our Services to you;
- provide you with more relevant and personalised information;
- promote products and services of some of our network of associated service providers and product vendors to you; and
- improve our Services.

We may only use this optional data with your consent.

Where you provide us with personal data about someone else, for example other authorised users of our Services, your employees and your customers/suppliers, you must have their consent or a valid legal reasons to use their personal data.

We do anonymise personal data so that we can use it to understand our customers and how our Services are used, for internal development and training and to demonstrate our Services. We may make that anonymised information available to others.

How, when and for how long we collect personal data

We most commonly collect personal data directly from our customers or their authorised representatives. Sometimes we may collect information from a third party or a publicly available source, but only if the person has consented to such collection.

In summary, we most commonly collect personal data when you:

1. Engage in Service-related activities, such as when you:
 - purchase, register, install or use our Services;
 - use our technical support or consulting services, which may require access to your data;
 - participate in Reckon programs, e.g. as a member of our Partner programmes, including as a re-seller; and
 - provide us with copies of your database or give us access to your database and systems so that we can provide you with the technical support or consulting services you requested.
2. Engage with us in other ways, such as:
 - in your normal communications with us, which may include recording details of those communications;
 - attending public functions, events, seminars, roadshows, conferences and training courses, either run by us or where the organisers have agreed with you that we

- may obtain your contact details;
- in entering competitions;
- using our website; and
- participating in forums, such as the Reckon Community or using other social media tools through our website or in relation to our Services.

We typically keep essential data for so long as we actively need it in order to service your account, deal with queries and, of course, to provide the Services to you. After that the essential data will be archived for reference purposes, such as if there is an historical query or an issue needs to be resolved. While you have a “right to be forgotten” this does not always mean we must delete your personal data – we may keep some personal data subject to various safeguards.

The optional data will only be kept and used for so long as you agree to this. We will assume that you will want to continue receiving marketing and Service-related communications that you have consented to until you tell us otherwise.

Transfer of Personal Data outside of the European Union

We use data processing facilities provided by Amazon AWS and Microsoft which are located in Sydney, Australia.

The Services are currently presented out of Australia, therefore your use of the Services will be conditional on you agreeing that the personal data may be exported to and processed in Australia. This applies even if your contract is with our UK company.

We currently use the following sub-processors (with links to their privacy terms), namely:

- Amazon (<https://aws.amazon.com/privacy/>);
- Microsoft (<https://privacy.microsoft.com/en-GB/privacystatement>);
- Stripe for payments (<https://stripe.com/gb/privacy>);
- Hotjar for gathering user data (<https://help.hotjar.com/hc/en-us/articles/115011639887-Data-Safety-Privacy-Security>);
- VWO (<https://vwo.com/platform/security-compliance/gdpr/>); and
- SendGrid for e-mails (<https://sendgrid.com/policies/privacy/>).

Any third party data processing facilities we use will only process your personal data in accordance with your written instructions and also, to the extent we direct the processing of any data, by us; though always in accordance with Australian and EU data protection laws.

Your personal data may also be provided by Reckon Partners when acquiring our Services through them.

The types of personal data we process

The personal data collected would generally comprise:

1. Personal contact details: name, address, postal address, telephone, fax and e-mail.
2. Service-related information: contact details, names and details of the authorised users of each Service.

3. Company information: high level information in relation to your business may be also be collected and may include details of your industry or profession.
4. Compliance-related data: details of the computer and user installing and using our Services, which may include internet protocol addresses and hardware identification.

In addition to the above, some of specialised Services may require the following:

- *Reckon BankData*: bank details and transaction data.

Using our website or social media tools

Depending on the type of activity you are engaging in, we may collect information directly and indirectly when you use our website or social media tools. We may also collect unidentifiable information from you relating to the pages you visit etc. See also the “*Reckon Website*” and “*Social Media & Public Forum*” sections below.

Where you have provided your personal details when visiting our website, such as your membership, account or customer details, or registered for an activity, entered transactions you have entered whether paid or free, we may also collect information from you relating to how you use our website, the pages you have viewed and the nature of the requests or enquiries you have made.

Both Hotjar and VWO are used to analyse usage patterns and to improve our website and Services, though where possible any information collected is anonymised.

Technical support or consulting services

If you request technical assistance or consulting services, you may contact us online, telephone or in person. We may require the following information from you in order to provide you the assistance needed:

- information relating to your problem and our suggested solutions are also recorded by us to assist in better customer relationship management;
- you may also need to provide copies of your data or grant access to your database so that we can assist you with your problem or inquiry; and
- you may also be required to provide other details for the purposes of identification and verifying authorisations to provide support, such as if you require us to make any changes to your account or settings.

Direct marketing

We will only use your personal data for direct marketing where we have obtained your consent, directly or indirectly (where it is reasonable to assume that you wish us to do so). In the absence of express consent from you, we will only use the information in a way that you would reasonably expect your personal data to be used in relation to our business and Services. For example, if you provide your business card to one of our employees at an event, we may communicate with you about our Services or future events, unless you instruct us not to do so. In all our direct marketing to you, you will always have the ability to request us to discontinue sending to you any further of such direct marketing material to you.

If you would prefer not to receive communications from us that do not relate to any Services to which you have subscribed or which you have purchased, please contact us (details below).

Disclosure

We will not disclose your personal data to anyone except as provided for in this Privacy Policy. If you have not already given consent to any disclosure then we will seek your consent before disseminating your personal data in the following ways:

- Where an external party wishes to communicate with any or all parts of the Reckon user/Advantage member database, and Reckon is agreeable to this communication being sent.
- Information may be provided to third party technical support services located outside the EU, for the purposes of dealing with technical support issues you may have raised to help us improve our Services and process generally.
- If you have signed up for add-on services provided by third party suppliers such as banking services, bank data downloads, superannuation payment services, merchant accounts and SMS text services. If so then personal data may also be passed on to the third party as part of providing those services, but you will need to agree to this and also that third party's privacy terms.
- Reckon may use, from time to time, external service providers to facilitate communications with its customers, for example SendGrid. In these circumstances, Reckon may provide personal contact/address information to the external service provider to enable the communication to be dispatched. Such information is provided to the external service provider on the strict basis that it be used for this purpose only and that their handling of the personal data provided to them complies with Reckon's Privacy Policy and the obligations of the UK and EU personal data laws with the external providers are put in place to ensure this.
- If required by law or to comply with a law, court order or legal process.

Reckon website

You may explore and browse our website without providing any information about yourself. When you visit our website, for example, to purchase any Services, or enrol into a training course, technical support, contribute to a forum, register for an event, participate in a competition or promotion, request further information from us, we generally request that you provide personal data about yourself primarily so that we can respond to your query, provide you with further information, confirm your details, booking, etc.

You may choose not to provide this information but this may prevent or restrict your use of our website and our Services.

The Reckon website uses:

- "cookie" technology. What are cookies? Cookies are pieces of information that a web site transfers to an individual's hard drive for record-keeping purposes. Cookies make web-surfing easier for you by saving your passwords, purchases, and preferences while you're on a website. The use of cookies is an industry standard - you'll find them at most major web sites. You have the ability to accept or decline cookies if you prefer. If you choose to decline cookies, you may not be able to experience the full

features of the website.

- “navigational information”. This is information about your computer and your visits to this website such as your IP address, geographical location, browser type, pages viewed, referral source. We use this information to improve the website. We may combine the navigational information and personal data to provide you with more tailored information about our Services and business.

Social media & public forum

Our website includes social media tools, such as the Facebook Like button and the share this button. These features are provided by third parties. When you use them you will be enabling the services of that third party. Your interaction with those services will generate and collect personal data which that third party will hold and process. Please ensure that you review their privacy policies before doing so as we have no control over them.

We also offer publicly accessible community forums, message boards and blogs. Please be mindful that any information you directly disclose through our public message boards, blogs, or forums, may be collected and used by others. We will correct or delete any information you have posted on the websites if you so request, please refer to “*Access to Information and Complaints*” section below. We will not moderate or otherwise control any content, but if we receive a complaint about anything you post or make available then we may remove that content until such time as that complaint has been resolved.

Information held by third party websites

Our website and Services may link to other websites. We do not control and are not responsible for, the content or data collection, handling and storage practices of any of these third party websites. Nor does the provision of any links to those websites constitute an endorsement of these other websites, their content or their practices. We do not have any control over any cookies or any tracking technologies these websites may apply.

This Privacy Policy does not apply to third party websites. These other websites are subject to their own privacy and any of their other related policies, if any.

How long do we keep Information for and how do we secure it

Reckon is committed to taking all reasonable steps to protect your personal data, including from misuse, interference and loss and unauthorised access, modification and disclosure.

We require all our employees, contractors and agents to agree to obligations of confidentiality with respect to information collected, handled or held by us or on our behalf, such as personal data and client information.

Information received by us or on our behalf, from clients or users of our Services is treated in accordance with these obligations of confidentiality, the terms of this Privacy Policy and our contract with you.

Reckon uses electronic customer management and database systems to store most of the personal data. Some of the customer management and database systems are web- based. Some of these systems may be provided by third party service providers. Our databases and systems are accessed by authorised users and contain security features to ensure the

protection and integrity of the data that we hold.

Customer data created using Reckon's Services is stored on our servers which are kept in secure data centres owned by third parties but managed, administered and controlled by Reckon.

We generally return or destroy or de-identify data which has been provided to use for technical support or consulting purposes. Some data, once de-identified, may be kept for training or QA purpose so that we may continue to develop and improve our Services and processes.

Some of your personal data (supplied when you signed up for the Services) may also be in stored in the above secure data centres in Australia.

Our "non-essential" or marketing-related information (see above) we will only keep for a limited period of time, but will assume that you will want to continue receiving our standard marketing e-mails and information once you've opted in to receive them. We may periodically review our contact information and remove details where we believe the data is no longer accurate or current. If that happens, please let us know that you still wish to receive communications from us.

The essential information will be used and retained for so long as we are providing the Services to you or need to keep the personal data in order to deal with any queries and/or disputes.

If you ask us to delete your confidential information we will do so but please note that where we need that information to deal with any potential disputes or verify your right to use our Services then we may have the right to retain that personal data, but that would be limited to those purposes.

Otherwise, if you ask us to delete your personal data this may prevent us from providing some or all of our Services, though your obligation to continue paying for them until then end of your contract term will persist.

Your rights and controlling your personal data

You have the following rights:

- The right to be informed: This privacy policy is intended to meet our obligation to provide "fair processing information".
- The right of access: You have the right at any time to ask to see a copy of the personal data we hold about you.
- The right to withdraw consent: Where you have given your consent to our processing you may withdraw this at any time.
- The right to rectification and data quality: If your personal data is incorrect or incomplete then you may ask us to remedy that.
- The right to erasure including retention and disposal: You may ask us to delete or remove your personal data where there is no compelling reason for its continued processing but this may affect any Services we provide to you which relies on that personal data.
- The right to restrict processing: Where you have highlighted an issue with the data.
- The right to data portability: This allows you to request that your personal data be shared with other processors at your request.
- The right to object: Where you have an objection to our processing you may do so.

In the UK, you may also have the right to lodge a complaint with the Information Commissioner's Office if you believe we are in breach of our legal obligations under data protection laws.

Access to information and complaints

If you would like:

- details of the personal data which we may hold about you;
- to correct any of the information that we hold; or
- to complain about a breach of the GDPR or any other legislation or applicable regulations relating to personal data,

please contact us as follows:

Reckon One Limited
1010 Cambourne Rd
Cambourne
Cambridge CB23 6DW

T: 0203 872 2867

E: uk@reckon.com

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