



Privacy Policy

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Privacy Policy

Our contact details:

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E-mail: legal@sapphiresystems.com

Scope: This policy applies to Sapphire Systems Limited and all its affiliates, subsidiaries, employees and contractors ("**Sapphire**," "**we**," "**us**," or "**our**") who process personal data, and applies to personal data Sapphire Systems Limited and all its affiliates, subsidiaries, employees and contractors process in the course of providing the Software and the Services, as defined below, to Sapphire's customers.

Sapphire takes the privacy of personal information seriously, we have prepared this Privacy Policy to describe the manner in which we collect, use, share and store personal information in compliance with applicable laws, including the General Data Protection Regulation (EU) 2016/679 and UK GDPR ("**GDPR**").

COLLECTION AND USE OF PERSONAL INFORMATION

Sapphire assists companies in transforming their entire IT function, through business application software (the "**Software**").

Sapphire provides Software implementation, consultancy, licensing, support, updates and maintenance. These services can be provided either on the customer's premises or on a cloud-based platform. The cloud-based platform can be either non-Sapphire supplied cloud or Sapphire supplied cloud - Sapphire Beyond (the "**Services**").

A company would become our customer when they contract with us to use our Services. The customer would be the data controller who control the personal information when using our Services and Sapphire would be the data processor acting upon customer's request.

Information we Process on behalf of our Clients:

In the course of providing the Services to our customers, we may process personal information about our (current, past, present and prospective) customers or other authorized users of the Services provided by the customer as set out below:

Support, Update and Maintenance Services: In order to provide support, maintenance and update Services, Sapphire may log onto the customer's Software and access customers' personal data (such as name, email address, and phone number).

Use of the Services: We may monitor use of the Software by our customers' employees or other authorized users in order to detect, investigate or prevent any actual or potential violation of our terms and conditions. This information is automatically collected from you when you use the Software.

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We require our customers to ensure that they have obtained all authority to provide personal information to Sapphire in accordance with applicable privacy laws. Except as set out herein, we do not collect or use personal information from our customers for any purpose other than to provide Services on behalf of our customers.

Information Sapphire can collect from you through other Interactions:

Inquiries: If you contact us with an inquiry, you may be asked for information that identifies you, such as your name, address and a telephone number, along with additional information we need to help us promptly answer your inquiry. We may retain this information to assist you in the future and to improve our customer service and service offerings.

Communications/Publications: We may offer you the ability to sign-up to receive Sapphire marketing and promotional communications or download a report, publication or other resources, in which case we collect certain information (such as first and last name, company name, email address or phone number). We use this information to send you the communications you have requested to receive. You can opt-out of receiving promotional email from us by following the opt-out or “unsubscribe” instructions provided in your email or other message, or by contacting: legal@sapphiresystems.com

Job Applications: If you apply for a job at Sapphire, you may provide us with certain personal information about yourself, such

as information contained in a resume/CV, cover letter, or similar employment-related materials. We may also collect personal information from third-party social networking websites including but not limited to, your LinkedIn profile, blog, website or similar portfolio. We may use this information when considering and responding to your application and assessing your suitability for current and future career opportunities.

Feedback & Reviews: We may collect and use customer feedback and/or reviews about our Services to better understand our customers and enhance our product and service offerings. With your consent, we may publish your feedback and/or reviews on our website or other promotional materials.

Surveys and Customer Research: From time to time, we may offer individuals an opportunity to participate in one of our surveys or other customer research. The information obtained is used in an aggregated, non-personally identifiable form. We use this information to help us understand our customers and to enhance our product and service offerings.

DISCLOSURE OF PERSONAL INFORMATION

As a matter of practice, Sapphire does not disclose, trade, rent, sell or otherwise transfer its customers' personal information, except as set out in this policy.

We may transfer or disclose personal information as follows:

Service Providers: In connection with our Services, we may transfer (or otherwise make available) personal information to

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third parties (also known as sub-processors) (including cloud-based service providers) who provide services on our behalf.

Our list of trusted Sub Processor is available upon written request, please contact us at legal@sapphiresystems.com.

Sale of Business: Sapphire may transfer personal information as an asset in connection with a prospective or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceeding) involving all or part of Sapphire or as part of a corporate reorganization or other change in corporate control.

Legal: Sapphire may disclose your personal information in response to a search warrant or other legally valid inquiry or order by United Kingdom or other foreign governmental authorities, courts or law enforcement agencies. Where a disclosure of our customers' information is required by applicable law, we promptly notify our customer prior to complying with such requirements (to the extent we are not prohibited from doing so) and fully co-operate with our customer's instructions with respect to our response.

INTERNATIONAL TRANSFERS

Personal information may be maintained and processed by Sapphire or its third-party service providers at a destination outside the European Economic Area ("**EEA**") or outside the jurisdiction in which you reside.

Where personal information is transferred or made available (including information transferred outside the EEA), Sapphire will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism, and that it is treated securely and in accordance with this privacy policy and applicable law.

We may transfer your personal information outside the EEA:

- to enable us to provide our Services, or to fulfil our contract with you or your employer. This includes the provision of the support Services.
- Where we are legally required to do so.
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

RETENTION OF PERSONAL INFORMATION

We have personal information retention processes designed to retain personal information for no longer than necessary for the purposes of providing Services to our customers or for the purposes set out in this Privacy Policy or to otherwise meet legal requirements. Sapphire only ever holds valid contact details (name, role, business email address, business telephone contact numbers) of these identified customer employees in password-protected, secure access, fully audited business software application.

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KEY PRINCIPLES

Sapphire is committed to the following key principles of GDPR compliance:

- **Integrity and confidentiality:** Sapphire will process personal data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- **Accuracy of the data:** Sapphire will take reasonable steps to ensure that personal data is accurate and up-to-date.
- **Data minimisation:** Sapphire will only collect and process personal data that is necessary for the purposes for which it is being processed.
- **Limitation of purpose:** Sapphire will only collect and process personal data for specified, explicit, and legitimate purposes.
- **Lawfulness, Transparency & fairness:** Sapphire will collect and process personal data in a transparent and lawful manner, and ensure that individuals are aware of the purposes for which their personal data is being processed.
- **Storage limitation:** Sapphire will not retain personal data for longer than necessary for the purposes for which it was collected.

- **Accountability:** Sapphire will be accountable for our compliance with GDPR, and will be able to demonstrate our compliance through appropriate policies and procedures.

Sapphire has appointed a third party who is responsible for overseeing and advising on Sapphire's GDPR compliance efforts.

Data Subject Rights

Sapphire will respect the rights of data subjects under GDPR, including the right to access, rectify, erase, restrict processing, object to processing, and data portability.

Security

Sapphire will take appropriate technical and organizational measures to ensure the security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Data Breach Notification

If required, Sapphire will promptly report any personal data breaches to the effective data subject. We will also work collaboratively with regulators and other relevant authorities as required by law to ensure that all necessary steps are taken to address and remedy the situation.

Third-Party Data Processors

Sapphire will only engage third-party data processors who can provide sufficient guarantees of GDPR compliance, and will ensure that appropriate data processing agreements are in place.

Training and Awareness

Sapphire will provide regular training and awareness programs to employees, contractors on GDPR compliance and their responsibilities under this policy.

Review and Update

We will review and update this policy as necessary to ensure ongoing compliance with GDPR requirements.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at: legal@sapphiresystems.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Revision	Responsible	Date of Change	Change Summary
V1.1	Giulia Rosano	12/04/2023	Initial New Doc
V1.2	Gilda Milicia	12/04/2013	Approved
V1.3			

Please note: This policy does not form part of any employee's terms and conditions of employment and Sapphire may amend it at any time

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Version Control

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