

Privacy Policy

Open Eye MSA GROUP Privacy Policy

Open Eye MSA GROUP and its subsidiaries and affiliates ("**OPENEYE**," "we" or "us") are committed to protecting and respecting your privacy.

This policy (together with our <u>Terms of Use</u> and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Your visit to <u>www.openeye-msa.org</u> (our "**site**") is governed by the practices described in this policy.

If you are an EEA visitor to our site, for the purposes of Data Protection Legislation (currently EU Directive 95/46/EC and, with effect from 25 May 2018, the General Data Protection Regulation ((EU) 2016/679) commonly known as the GDPR ("**DPL**"), we are the data controller.

You can contact us at any time via email to <u>admin@openeye-msa.org</u>

1 Personal Information We Collect from You

We collect and process the following personal information about you:

(a) Information you give to us

When you visit our site and create an account, email us, engage in live chat, register for our services or by corresponding with us by phone, e-mail or otherwise, we ask for certain personal information. This includes some or all of your name, address, e-mail address and phone number.

(b) Information we collect about you

With regard to each of your visits to our site we will automatically collect the following information:

(i) 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;

(ii) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); items 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 us.

(c) Information we receive from other sources

We are also working closely with third parties (including, for example, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) and may receive information about you from them, resulting from the work they carry out on our behalf.

2 Uses Made of the Personal Information

- 2.1 We use information we collect about you in the following ways:
 - (a) Information you give to us

We will use this information:



(i) to carry out our contractual obligations arising from any contracts entered into between you or your organization and us for any of our services;

- (ii) to provide you product or other information that you or your organization requests from us;
- (iii) subject to your consent, to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- (iv) to notify you about changes to our service.
- (b) Information we collect about you

We will use this information:

(i) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

(ii) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

(iii) to allow you to participate in interactive features of our service, when you choose to do so;

- (iv) as part of our efforts to keep our site safe and secure.
- (c) 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 us this information and the combined information for the purposes set out above (depending on the types of information we receive).

3 Disclosure of Your Personal Information

3.1 We may share your information with other [OPEN EYE MSA GROUP members and their subsidiaries and affiliates]

("Affiliates") for the purposes of providing our services to you.

- 3.2 We may share your information with our service providers being:
 - (a) registered email addresses for the purpose of opt-in mailing lists, survey processing and the provision of technical support; and
 - (b) analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 3.3 We may disclose your personal information to third parties if:

(a) OPEN EYE MSA GROUP or any of its Affiliates or certain business lines are acquired in whole or in part, including the acquisition of substantially all of the assets of OPEN EYE MSA GROUP or any Affiliate, by a third party, in which case personal data held by it will be one of the transferred assets;

(b) If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply our <u>Terms of Use</u> or other agreements with you;

(c) to protect the rights, property or safety of OPEN EYE MSA GROUP; this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4 Where We Store Your Personal Information



4.1 All information you provide to us is stored on the secure servers of our service providers. We currently use third party service providers for the purposes of storing personal data and providing services to you, such as data management and storage, cloud storage, email and marketing communications, career services and technical support services.

4.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

4.3 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

5 Transfers of Data Outside the EEA

5.1 The disclosure of personal data to us involves the transfer of that personal data to the United States. We are a global organisation, and so are many of our service providers, therefor your personal data may also be transmitted to other countries outside the EEA. Those countries may not have the same laws as your own for the protection of personal data.

5.2 To protect your personal data outside the EEA we use Model Contracts pursuant to Decision 2004/915/EC (controller to controller) and Decision 2010/87/EU (controller to processor) as appropriate.

6 Retention of your Personal Information

6.1 We will endeavour to only keep your information for as long as we need it. If there has been no activity between us for twelve (12) months, we will endeavour to delete your personal data at that stage.

7 Your Rights

- 7.1 Under the DPL you have the right to:
 - (a) access your personal information;
 - (b) have any mistakes in your personal information rectified;
 - (c) restrict the use of your personal information;
 - (d) ask for your personal information to be erased;
 - (e) object to the processing of your personal information;
 - (f) data portability;
 - (g) to withdraw consent where you have provided it for any processing; and
 - (h) the right to lodge a complaint with your supervisory authority under the DPL.
- 7.2 To exercise any of the rights listed in Section 7.1, please email us at <u>admin@openeye-msa.org</u>

7.3 In addition, any marketing information which we send to you via email will contain an "unsubscribe" button which you can use at any time.

7.4 Our site 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.

8 Marketing Information



8.1 If you would like to receive marketing information about our products or services by email please visit our site to sign-up for our newsletter.

8.2 In addition, any marketing information which we send to you via email will contain an "unsubscribe" button which you can use at any time.

9 Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our <u>Cookie</u> <u>Policy</u>.

10 Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

11 Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to <u>admin@openeye-msa.org</u>

Effective Date September 2nd, 2019