



## Milner Browne Enterpryze Privacy Policy

### Privacy

The Company respects your right to privacy and is committed to complying with its obligations accordance with applicable data protection legislation, amended from time to time, including the Data Protection Act 2018, the ePrivacy Directive 2002/58 enacted in Ireland by S.I. No. 336 of 2011 and the General Data Protection Regulation EU 2016/679 (“GDPR”) “Applicable Data Protection Legislation” and UK Equivalent. The Company has prepared this Privacy Policy to describe the manner in which it collects, uses, discloses and otherwise manages Personal Information in connection with the Software, Support and Services offered by the Company. The Company will only process Personal Information in accordance with “applicable data protection legislation”.

Please read this Privacy Policy carefully. By continuing to access and use the Website and/or Software, Services and Support, Users are deemed to have understood and agreed to the terms of this Privacy Policy in respect of the information collected about them. If a User does not accept the terms of the Privacy Policy, that User should not access or use the Website and Software, and discontinue use of the Services and Support.

In the UK Enterpryze provides you with regulated account information services as an agent of Plaid Financial Ltd., an authorised payment institution regulated by the Financial Conduct Authority under the Payment Services Regulations 2017 (Firm Registration Number: 804718) for the provision of payment services, including account information services."

### LEGAL BASIS FOR PROCESSING

We use your personal information only as permitted by law. Applicable EEA and UK data protection law requires us to have a “legal basis” for each purpose for which we collect your personal information. Our legal basis for collecting and using the Personal Information described in this Privacy Statement will depend on the type of Personal Information and the specific context in which we collect it. However, we will normally process personal information from you when:

- An organisation you work for or provide services to uses Milner Browne Enterpryze Software
- We have your consent to do so;
- We have a contract with you or the data controller and it is necessary to process your personal information to perform our contract with you or the data controller, including to provide you with the benefits of the Milner Browne Enterpryze Platform;
- The processing is in our legitimate business interests, such for security prevention and/or to detect illegal activities; and/or
- To comply with legal requirements, including applicable laws and regulations Where an organisation you work for uses Milner Browne Enterpryze Software

If You use Milner Browne Enterpryze Software through for employer or organisation engaging you for services, for example, then we will process your personal data as a processor (and the organisation



engaging you is the data controller). We recommend you read the relevant data controller privacy documentation for information explaining what personal data is collected, and what for.

We may contact you from time to time as necessary to fulfil our contractual obligations with the data controller on matters regarding downtime or services updates.

## **INTERNATIONAL DATA TRANSFERS**

Data may be transferred to, and processed in, countries other than your country of residence which are subject to regulations different to EEA and UK GDPR regulations. Where we disclose Personal data to a third party in another country, we implement appropriate technical and security safeguards to ensure your Personal data remains protected.

For individuals in the European Economic Area (EEA) and UK, your data may be transferred outside of the EEA or UK. Where your Personal data is transferred outside the EEA or UK, it will only be transferred to countries that have been identified as providing adequate protection for EEA/UK data, or to a third party where we have approved transfer mechanisms in place to protect your Personal data and which has been approved by the data controller if appropriate.

## **RETENTION**

We shall retain your Personal data for the duration of the Agreement to provide you with services you've requested or to comply with applicable legal, tax or accounting requirements).

Your personal data will be retained for as long as we have a relationship with you and will be returned to You or the data controller on termination, expiration or on request, in accordance with our data retention policies and practices. Following that period, User's Personal Data will be deleted or anonymised.

## **YOUR RIGHTS**

Rights of Data Subjects are as set out under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation), Article 12

You have the following rights:

- Right of access: In accordance with Article 15 of the GDPR, you have the right to ask for: (i) your Personal data in an accessible format; (ii) confirmation that your Personal data are or are not being processed; (iii) information about the processing purpose, categories of Personal data processed and who your Personal data is communicated to; and (iv) the storage period of your Personal data or the criteria used to determine that period.
- Right to data portability: In accordance with Article 20 of the GDPR, you have the right to request a copy of your Personal data from in a format that is structured, commonly used and machine readable so you can provide them to another data controller.



- Right to rectification: In accordance with Article 16 of the GDPR, you have the right to ask to modify, add to and update your Personal data if they are found to be incorrect, incomplete, ambiguous or out of date.
- Right to erasure (right to be forgotten): In accordance with Article 17 of the GDPR, you have the right to ask to permanently erase your Personal data as soon as practicable, including when you consider that they are no longer necessary in terms of the purpose for which they were collected or that we are no longer justified in processing them.
- Right to restrict processing: You have the right to ask to restrict the processing of all or part of your Personal data only in the situations described in Article 18 of the GDPR, being:
  - Checking the accuracy of the Personal data that you dispute.
  - Helping you confirm, exercise or defend your legal rights, even when Milner Browne Enterpryze no longer needs your Personal data.
  - Checking if Milner Browne Enterpryze's legitimate interests prevail over yours, in the event that you object to your Personal data being processed on the basis of Milner Browne Enterpryze's legitimate interest.
  - Complying with your request to restrict the use of your Personal data rather than erasing them, when the processing of that data has proven to be unlawful.
- Right to object: In accordance with Article 21 of the GDPR, you have the right to object at any time, for reasons relating to your situation, to the processing of your Personal Data for canvassing purposes or a purpose based on legitimate interests. If we cannot demonstrate a legitimate, pressing interest for that processing, we will only continue to process the Personal data not covered by your request.
- Right to withdraw consent. You have the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Consent can easily be obtained by emailing [dpo@Enterpryze.com](mailto:dpo@Enterpryze.com) or writing to: MB Enterpryze Cloudware Limited, Unit 3, Block AC, Cherrywood Business Park, Dublin D18 TF72, Ireland.

If you have questions about your Personal Data processing or want to exercise your rights, please contact Milner Browne Enterpryze by emailing our Data Protection Officer at [dpo@Enterpryze.com](mailto:dpo@Enterpryze.com) and/or posting a letter to MB Enterpryze Cloudware Limited, Unit 3, Block AC, Cherrywood Business Park, Dublin D18 TF72, Ireland, or by completing the contact form on our Website (in the UK you may contact The Information Commissioner's Office at [dpo@ico.org.uk](mailto:dpo@ico.org.uk) or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF) and if relevant, we shall coordinate with the data controller.

In your email or letter please state:

- Your full name and email address
- The subject of your request, and if it involves exercising a right:
- The type of right you want to exercise and the reasons justifying it, and
- Where appropriate, your request to exercise that right
- Milner Browne Enterpryze may check your identity before actioning your request.



We (or the data controller) will provide you with information about the actions taken as soon as possible, and in any case within one (1) month of receiving your request. This timeframe may be extended to two (2) months for more complex requests. If we cannot action your request, we will tell you why and inform you of your ability to lodge a complaint with a supervisory body or pursue legal recourse.

There is no cost to exercise these rights. However, in the event of blatantly unfounded or excessive requests, Milner Browne Enterpryze reserves the right to (i) require payment of expenses taking into account administrative costs, and (ii) refuse to process those requests.

## **1 CHANGES TO PRIVACY POLICY**

The Company may amend this Privacy Policy periodically to reflect changes to its Personal Information practices. Any amended Privacy Policy shall be effective upon the date of publication by the Company. By accessing and using the Website or the Software, Users are accepting that they are bound by the current Privacy Policy. Please check the Privacy Policy regularly to ensure that you are aware of the prevailing terms of the Privacy Policy