

Your Privacy: How OneAdvanced Handles Your Data (Customers & Suppliers)

This privacy notice explains how **OneAdvanced** (referred to as "we," "us," or "our") processes and protects your personal information when we act as the **Data Controller** for our customers and suppliers.

Important Note: When We Are a Data Processor

For the majority of services we provide to our customers, OneAdvanced acts as a **Data Processor**. In these situations, this privacy notice **does not apply**. Instead, your own privacy notice will govern that data processing.

Introduction

This privacy notice outlines how OneAdvanced Group Limited and its subsidiaries (collectively, **OneAdvanced**) collect, use, manage, and retain your personal data when providing products and services to you as a customer or supplier.

Our **Global Data Protection Officer (GDPO)** provides guidance to help us meet our obligations and ensure your data is protected. We take your privacy seriously and implement strong measures to secure the personal data we collect, using it only as described in this notice.

What Personal Information Do We Collect and Why?

We collect different types of personal information depending on how you interact with us. Here's a breakdown of what we collect and why:

Marketing

If you're a customer, we collect your **business email address, full name, company name, and business contact number** for marketing our products and services to you. We also send relevant business communications and support-related information to keep you informed about our services, business updates, and certain offerings from our selected partners. Our lawful basis for this processing is **legitimate interests**.

Support Services

When you contact us for **support services**, e.g. feedback, technical requests, etc., we may use this information for **research**, **analytics**, **and product/third-party tool development**. Wherever possible, we will **aggregate and anonymise** this information, so it no longer identifies you. Our lawful basis for this processing is **performance of a contract**.

Research & Development

We process your personal data to **improve our products and services**, ensuring they meet your needs and provide a positive user experience. We use various research methods:

For most research activities, our lawful basis is legitimate interests.



 For interview-based research that involves audio or video recordings, we'll always ask for your explicit consent to participate. The personal data collected in these instances may include your name, contact details (like email and phone number), image, voice, and the opinions you express during the research activity.

Webchat and Contact Us Form

When you use our **webchat service** (provided by "Qualified") or our **Contact Us Form**, we collect your personal data to respond to your inquiries and provide information or advice about our products or services. Our lawful basis for this is **performance of a contract**, and we keep this data for the duration of our relationship with you.

Suppliers

If your company supplies us with goods and services, we will collect your **business contact information** (full name, job role, work address, email address, and contact number) to enable us to communicate with you. Our lawful basis for this is **performance of a contract**.

Communication

When we've entered into a contract with you to provide products and services, we'll need to **communicate** with you to fulfil our contractual obligations. Our accounts team will also process invoices for any payments due. We cannot fulfil our contract without certain **business contact details**, such as your name, job title, email address, and phone number. Our lawful basis for this is **performance of a contract**.

OneAdvanced Al

When using OneAdvanced AI, you decide what personal data you enter, and you remain the controller for that data. When you create an account, we collect the following:

- Account Information: Your name, contact details, and account credentials.
- **Content:** Personal data you provide as input, including prompts and other uploaded content (e.g., files), depending on how you use OneAdvanced AI. We do not use or access this content for any purpose other than providing the service to you.
- **Technical Information:** When you visit, use, or interact with OneAdvanced AI, we receive:
 - Log Data: Information automatically sent by your browser or device, including your IP address, browser type and settings, date and time of your request, and how you interact with OneAdvanced AI.
 - Usage Data: Information about how you use OneAdvanced AI, such as content types you view, features you use, actions you take, your time zone, country, access dates/times, user agent, device type, and connection.
 - Device Information: Details about the device you use, like its name, identifiers, and operating system. The information collected may vary based on your device type and settings.



 Location Information: For security and to enhance your experience (e.g., detecting unusual login activity, providing more accurate responses), we may determine the general location from which your device accesses OneAdvanced Al, based on information like its IP address.

OneAdvanced AI is hosted in the UK, and each customer environment is private and secure to that customer. If you purchase OneAdvanced AI, either independently or with other products, you may wish to read our **OneAdvanced AI Explainability Statement**.

Information We Collect from Third Parties

We may collect information about you from **third-party partners**, if you've shown interest in our products and services. This typically includes your **full name**, **the company you work for**, **and your business email address**.

Social Media and Third-Party Platforms

We use social networking sites such as LinkedIn, Sales Navigator, and X (formerly Twitter).

Please be aware that **we do not control how these third-party sites collect, store, or use your personal information**. We strongly recommend you review the privacy policies and settings on any social networking site you use to understand what information they may share about you. If you wish to prevent your social networks from sharing information about you, you should contact them directly to explore your opt-out options. OneAdvanced is not responsible for how these third-party sites use your information.

Who We May Share Your Personal Information With

We may share your information with our **agents and service providers** for the purposes described in this privacy notice, including:

Marketing agencies specialising in social media to help us connect with your social networks and generate interest in our products and services. We may provide access to our websites to marketing agencies and business partners to enable sharing of product and service interests within your network.

- Agents acting on our behalf to carry out search engine optimisation, modelling, analysis, market and customer research, and statistical analysis to improve our website and services.
 These agents include creative agencies, professional user experience testing agencies, and search engine optimisation agents. We do not provide personal information to these agents.
- Our processors and sub-processors, including IT system providers such as Salesforce (our Customer Relationship Management system), our financial management system, and IT infrastructure providers like Microsoft (Azure) or Amazon (AWS).



- Our **email platform service provider** or other service providers we use to send you service and marketing messages.
- Other **OneAdvanced group companies** for general business purposes, leveraging internal expertise, back-office support, customer support, and to maximise group effectiveness.
- The **police**, **other relevant law enforcement agencies** (in the detection or prevention of a crime), **and public bodies**.
- Government bodies and regulators such as HMRC or data protection regulators worldwide.
- Our legal and professional advisors, including our auditors (e.g., financial auditors or our ISO 27001 certification body).
- **Debt recovery agencies** when pursuing repayment of a debt.
- An organisation taking over all or nearly all of our business assets; we may pass your personal information to them.
- As required to comply with the law.

Lawful Basis for Processing Your Information

Our lawful bases for processing your information include:

- Legitimate interests pursued by us, third parties, or selected partners we work with to
 promote our products or services, or for research to improve and develop our products and
 services.
- Performance of our contract with you.
- Any **legal obligation** with which we must comply.

Duration of Processing

We retain personal data processed by us for as long as necessary for the purpose for which it was collected, as set out in the table below:

Type of Data	Retention Period
Support service logs	12 months, then deleted
Webchat	Kept for the duration of our contract with you
Communications	Kept for the duration of our contract with you



Type of Data	Retention Period
Research data	2 years, then deleted
Call recordings	12 months, then deleted
Consent for email marketing	Kept until you unsubscribe
Cookies	See our separate cookie policy

We may retain personal data for longer periods where required by applicable law or regulation, or to establish, exercise, or defend our legal rights as provided for in data protection legislation.

Third-Party Websites

Our websites may contain links to **third-party websites**. We are **not responsible** for how these external sites process your personal information. We encourage you to **review the privacy notice** of every third-party website you visit and contact their owner with any questions or concerns.

International Data Transfers

OneAdvanced operates globally, with offices and subsidiaries in the **UK**, **EU**, **USA**, **Canada**, **India**, **and Australia**. We share data with authorised personnel in these locations to deliver our services and operate our business, always adhering to the purposes and legal justifications outlined in this notice. To ensure lawful data sharing across our international offices, we've implemented **appropriate safeguards** compliant with applicable local and national data protection laws.

We also use **third-party and cloud-based service providers** who may be located outside the UK/EEA. In such cases, we ensure robust safeguards are in place, in line with applicable data protection legislation. For all organisations with whom data is shared or accessible outside the UK or EEA, our agreements include **EU and/or UK approved Standard Contractual Clauses** and any additional security measures required by law.

Your Data Protection Rights

Depending on your geographical location, you have certain rights under applicable data protection laws. For individuals in jurisdictions where **GDPR or UK GDPR** applies, these rights include:



Right to Access

You can ask OneAdvanced to confirm what personal information we hold about you and how it's processed. To exercise this right:

- **Existing customers:** Please contact the Support Desk.
- **Job applicants:** Please refer to the recruitment privacy notice on our careers page.
- Others or alternative contact: Please email us at <u>dataprotection@oneAdvanced.com</u>.

We aim to respond promptly, and in any event, within the time limits required by data protection legislation and other applicable laws. Please note that you may need to verify your identity to receive the information.

Right to Rectification

You have the right to have inaccurate personal data corrected.

- **Existing customers:** You may update your data within the relevant application or via any suitable customer support portal you have access to. Alternatively, you can contact the Support Desk.
- Visitors to our website, Marketing Leads, and Prospective Clients: You can update your personal information submitted via our corporate website by contacting us through the Contact Form.
- Job applicants: Refer to the recruitment privacy notice on our careers page.
- Others: Please email us at <u>dataprotection@oneadvanced.com</u>.

Subject to applicable law, regulations, exemptions, and verification checks, we will update our records based on the accurate information you provide.

Right to Object

You have the right to object to direct marketing where our lawful basis is legitimate interests. You can **opt out of this anytime** by following the instructions provided [insert link here] or by clicking the unsubscribe link in any marketing email you receive from OneAdvanced.

Withdrawal of Consent

We do not rely on consent for most of our processing activities, except for certain email marketing activities. In such instances, you have the right to **withdraw your consent at any time**. You can do this by following the instructions provided or by clicking the unsubscribe link in the relevant email from OneAdvanced.

Right to Be Informed

You have the right to be informed about the data we process about you. This Privacy Notice is designed to provide you with this information. We will keep it updated to reflect any changes in our processing activities.



Other Rights

In addition to the rights listed above, you also have other rights such as the **Right to Erasure**, **the Right to Restrict Processing**, and the **Right to Data Portability**.

If you wish to exercise any of these rights, please contact our data protection team at dataprotection@oneadvanced.com.

Complaints

We strive to maintain an efficient and effective data protection compliance framework within our organisation. However, if you have any questions or concerns about this Privacy Notice, or if you wish to complain about our use of your personal data, please contact us:

Data Protection Office The Mailbox 101 Wharfside Street Birmingham B1 1RF

Email: dataprotection@oneadvanced.com

You also have the right to lodge a complaint directly with the Data Protection Authority in the UK, an EU member state, or any other regulatory body that oversees the use of personal data in your jurisdiction.

The OneAdvanced Head Office is in the UK, and the relevant supervisory authority is the **Information Commissioner's Office (ICO)**. Please visit the **ICO** website for further information.

Who is Your Data Controller?

OneAdvanced Group Limited is a global company registered in England and Wales under company number 05965280, with its registered office at The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF. OneAdvanced Group Limited is your **Data Controller**.

Any subsidiary of OneAdvanced may also process your data. Below is a list of our main subsidiaries by region:

Australia

 OneAdvanced Asia Pac Pty Ltd (trading as Portt) - ACN 142 778 005. Registered office: C/o BD0, Level 10, 12 Creek Street, Brisbane QLD 4000.

Canada

OneAdvanced Canada Inc. - Company number 1907593. Registered office: 199 Bay Street,
 5300 Commerce Court West, Toronto, Ontario, Canada, M5L 1B9.



England and Wales

- OneAdvanced Limited (trading as OneAdvanced) Company number 03214465. Registered office: The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.
- OneAdvanced IT Services Limited (trading as OneAdvanced) Company number 02124540.
 Registered office: The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.
- Advanced Health and Care Limited (trading as OneAdvanced) Company number 02939302.
 Registered office: The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.
- The National Will Register Limited Company number 06256187. Registered office: The Mailbox, 101 Wharfside Street, Birmingham, B1 1RF.

Ireland

- Advance Systems International Limited (Ireland) Company number 225199. Registered office: Unit 4L, The Square Industrial Complex, Tallaght Dublin 24, Tallaght, Dublin, Ireland.
- Careworks Limited (trading as OneAdvanced) Company number 262153. Registered office: Unit 4L, The Square Industrial Complex, Tallaght Dublin 24, Tallaght, Dublin, Ireland.

India

 OneAdvanced India Private Ltd (trading as OneAdvanced) - Company number U72900KA2001PTC028589. Registered office: W76, 2nd Floor, ClayWorks Opus, Campbell Rd, Austin Town, Bengaluru-560047, Karnataka, India.

United States of America

• OneAdvanced Inc. (trading as OneAdvanced) - Company number 7856661. Registered office: 3455 Peachtree Road NE, Suite 500, Atlanta, GA 30326, USA.

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