

PRIVACY POLICY

1. PURPOSE OF OUR POLICY

- 1.1. eSignatures.io (**we, us** or **our**) has adopted this Privacy Policy to ensure that we have standards in place to protect the Personal Information that we collect about individuals that is necessary and incidental to:
 - (a) Providing the system and services that we offer; and
 - (b) The normal day-to-day operations of our business.
- 1.2. By publishing this Privacy Policy we aim to make it easy for our customers and the public to understand what Personal Information we collect and store, why we do so, how we receive and/or obtain that information, and the rights an individual has with respect to their Personal Information in our possession.

2. WHO AND WHAT THIS POLICY APPLIES TO

- 2.1. Our Privacy Policy deals with how we handle “personal information”.
- 2.2. We handle Personal Information in our own right and also for and on behalf of our customers and users.
- 2.3. Our Privacy Policy does not apply to information we collect about businesses or companies, however it does apply to information about the people in those businesses or companies which we store.
- 2.4. The Privacy Policy applies to all forms of information, physical and digital, whether collected or stored electronically or in hardcopy.
- 2.5. If, at any time, an individual or a business provides Personal Information or other information about a person, the individual or business warrants that they have that person's consent to provide such information for the purpose specified.
- 2.6. Our website and services are unavailable to children (persons under the age of 18 years).

3. THE INFORMATION WE COLLECT

- 3.1. In the course of business it is necessary for us to collect Personal Information. This information allows us to identify who an individual is for the purposes of our business, share Personal Information when asked of us, contact the individual in the ordinary course of business and transact with the individual. The type of information we may collect is:
 - (a) **Personal Information.** We may collect personal details such as an individual's name, location;
 - (b) **Contact Information.** We may collect information such as an individual's email address, telephone number that allows us to contact the individual;
 - (c) **Financial Information.** We may collect financial information related to an individual such as any bank or credit card details used to transact with us and

other information that allows us to transact with the individual and/or provide them with our services;

- (d) **Statistical Information.** We may collect information about an individual's activities on our website. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.
- (e) **Information an individual sends us.** We may collect any personal correspondence that an individual sends us, or that is sent to us by others about the individual's activities.

4. HOW INFORMATION IS COLLECTED

4.1. Most information will be collected in association with an individual's use of eSignatures.io, an enquiry about eSignatures.io or generally dealing with us. However we may also receive Personal Information from sources such as advertising, an individual's own promotions, public records, mailing lists, contractors, staff, recruitment agencies and our business partners. In particular, information is likely to be collected as follows:

- (a) **Registrations/Subscriptions.** When an individual registers or subscribes for a service, list, account, connection or other process whereby they enter Personal Information details in order to receive or access something, including a transaction;
- (b) **Accounts/Memberships.** When an individual submits their details to open an account and/or become a member with us;
- (c) **Supply.** When an individual supplies us with goods or services;
- (d) **Contact.** When an individual contacts us in any way;
- (e) **Access.** When an individual accesses us physically we may require them to provide us with details for us to permit them such access. When an individual accesses us through the internet we may collect information using cookies (if relevant – an individual can adjust their browser's setting to accept or reject cookies) or analytical services; and/or
- (f) **Pixel Tags.** Pixel tags enable us to send email messages in a format customers can read and they tell us whether mail has been opened.

4.2. As there are many circumstances in which we may collect information both electronically and physically, we will endeavour to ensure that an individual is always aware of when their Personal Information is being collected.

4.3. Where we obtain Personal Information without an individual's knowledge (such as by accidental acquisition from a client) we will either delete/destroy the information, or inform the individual that we hold such information.

5. WHEN PERSONAL INFORMATION IS USED & DISCLOSED

5.1. In general, the primary principle is that we will not use any Personal Information other than for the purpose for which it was collected other than with the individual's permission. The purpose of collection is determined by the circumstances in which the information was collected and/or submitted.

- 5.2. We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.
- 5.3. We will not disclose or sell an individual's Personal Information to unrelated third parties under any circumstances.
- 5.4. Information is used to enable us to operate our business, especially as it relates to an individual. This may include:
- (a) The provision of goods and services between an individual and us;
 - (b) Verifying an individual's identity;
 - (c) Communicating with an individual about:
 - i. Their relationship with us;
 - ii. Our goods and services;
 - iii. Our own marketing and promotions to customers and prospects;
 - iv. Competitions, surveys and questionnaires;
 - (d) Investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity; and/or
 - (e) As required or permitted by any law (including the Privacy Act).
- 5.5. There are some circumstances in which we must disclose an individual's information:
- (a) Where we reasonably believe that an individual may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority should be made aware of;
 - (b) As required by any law; and/or
 - (c) In order to sell our business (in that we may need to transfer Personal Information to a new owner).
- 5.6. To operate our business we may utilise third-pay service providers to communicate with an individual and to store contact details about an individual.

6. **OPTING "IN" OR "OUT"**

- 6.1. An individual may opt to not have us collect their Personal Information. This may prevent us from offering them some or all of our services and may terminate their access to some or all of the services they access with or through us. They will be aware of this when:
- (a) **Opt In.** Where relevant, the individual will have the right to choose to have information collected and/or receive information from us; or
 - (b) **Opt Out.** Where relevant, the individual will have the right to choose to exclude himself or herself from some or all collection of information and/or receiving information from us.

- 6.2. If an individual believes that they have received information from us that they did not opt in or out to receive, they should contact us on at support@esignatures.io.

7. THE SAFETY & SECURITY OF PERSONAL INFORMATION

- 7.1. We will take all reasonable precautions to protect an individual's Personal Information from unauthorised access. This includes appropriately securing our physical facilities and electronic networks.
- 7.2. eSignatures.io uses reliable encryption technologies to store and transfer Personal Information. Despite this, the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the internet or by post does so at their own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, Personal Information where the security of information is not within our control.
- 7.3. We are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose an individual's Personal Information to in accordance with this policy or any applicable laws). The collection and use of an individual's information by such third parties may be subject to separate privacy and security policies.
- 7.4. If an individual suspects any misuse or loss of, or unauthorised access to, their Personal Information, they should let us know immediately.
- 7.5. We are not liable for any loss, damage or claim arising out of another person's use of the Personal Information where we were authorised to provide that person with the Personal Information.

8. HOW TO ACCESS AND/OR UPDATE, REMOVE INFORMATION

- 8.1. Users of eSignatures.io can update their Personal Information from within their eSignatures.io account or profile.
- 8.2. An individual has the right to request from us the Personal Information that we have about them.
- 8.3. If an individual cannot update its own information, we will correct any errors in the Personal Information we hold about an individual within 7 days of receiving written notice from them about those errors.
- 8.4. It is an individual's responsibility to provide us with accurate and truthful Personal Information. We cannot be liable for any information that is provided to us that is incorrect.
- 8.5. If requested to remove data, we will respond within a reasonable timeframe. In certain circumstances we may be required by law to retain personal information, or may need to retain personal information in order to continue providing a service.

9. COMPLAINTS AND DISPUTES

- 9.1. If an individual has a complaint about our handling of their Personal Information, they should address their complaint in writing to the details below.
- 9.2. If we have a dispute regarding an individual's Personal Information, we both must first attempt to resolve the issue directly between us.

- 9.3. If we become aware of any unauthorised access to an individual's Personal Information we will inform the related parties at the earliest practical opportunity once we have established what was accessed and how it was accessed.

10. CONTACTING INDIVIDUALS

- 10.1. From time to time, we may send an individual important notices, such as changes to our terms, conditions and policies. Because this information is important to the individual's interaction with us, they may not opt out of receiving these communications.

11. CONTACTING US

- 11.1. Support: support@esignatures.io
- 11.2. DPO: Zsolt Hanko zsolt@esignatures.io

12. ADDITIONS TO THIS POLICY

- 12.1. If we decide to change this Privacy Policy, we will post the changes on our webpage at esignatures.io Please refer back to this Privacy Policy to review any amendments.

APPENDIX

The list of sub processors and their roles as of our current Data Processing Addendum is as set forth below:

Amazon Web Services, Inc

Cloud Service Provider, USA

- Server hosting
- Storing audit trail documents (encrypted at rest)
- Storing signed documents (encrypted at rest)
- Storing log files (encrypted at rest)
- Database hosting (Personal Data is encrypted)
- Storing database backups (encrypted at rest)
- Delivering email messages
- Delivering text messages
- Personal Data shared: name, email, mobile number, IP address, Device identifier, last four digits of credit card, expiry date of credit card, internal identifier

Google, LLC

Google Analytics, USA

- Collecting statistical information of user interactions (excluding interactions of contract signing persons)
- Personal Data shared: masked IP address

Solarwinds Worldwide, LLC

Cloud logging service

- Storing log files (limited to 7 days)
- Personal Data shared: name (encrypted), email (encrypted), mobile number (encrypted), IP address, Device identifier (encrypted), internal identifier

Stripe, Inc

Payment service provider, USA

- Collecting fees
- Personal Data collected by Stripe: name, credit card information, address
- Personal Data stored by us: internal identifier, last four digits of credit card, expiry date of credit card

Twilio, Inc

SMS authenticator, USA

- Sending transactional text messages
- Personal Data shared: mobile number, internal identifier

Wildbit, LLC

Email delivery service, USA

- Sending transactional emails
- Personal Data shared: name, email, mobile number, internal identifier