

This privacy statement covers the practices that activpayroll employs when we receive information from our customers and when information is processed in order that we can deliver services to our customers on either a national or international basis.

activpayroll operates the <https://activ8.activpayroll.com> website and will use your data to carry out global and domestic payroll delivery processing including expatriate taxation services (the "Services").

By using the Services, you agree to the collection and use of information in accordance with this policy.

Purpose of Policy

The purpose of this Privacy Policy is:

- to assure you that we recognise and fully respect the privacy and personal data of our customers; and
- to explain what type of data we receive and how we ensure its best protection

Type of Data

For the purpose of delivering the Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your name, phone number, postal address, bank account, demographic information or other material ("Personal Information").

Data Protection

Any processing will be fair, lawful, and to the extent, and in such a manner, as is necessary in order to meet activpayroll's obligations under the agreement with the customer and not process such Personal Data for any other purpose. In particular, activpayroll will: -

- comply at all times with the provisions of the applicable data protection legislation and take appropriate technical and organisational measures against unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to Personal Data
- only act on the customer's instructions in relation to the processing of such Personal Data;
- restrict access to the customer data to those employees, officers, subcontractors and other third parties whose access is necessary to perform the Services;

Disclosure of Data

activpayroll has a rigid policy of non-disclosure of information. activpayroll shall only disclose information provided by you or obtained from your employer when there is a requirement to do so as part of delivery of the services and you are aware of the disclosure.

If activpayroll or any of its representatives are requested pursuant to, or become compelled by law, regulatory request, legal process, subpoena or court order to disclose customer data, activpayroll will provide the customer with advance notice where legally possible. We will disclose only that portion of the customer data which we are legally obliged to provide

We shall not share or distribute customer information and data with third parties other than to deliver the services as per the contractual arrangements between us and our customers.

Access of Data

Access to data is based on job role and functional responsibility with data segregation and access restrictions ensuring that your information can only be accessed by those having a legitimate need to view and process the data.

Type of Data

We may collect, obtain and use the following Personal Information in relation to you:

- Any Personal Information you supply to us directly;
- Personal Information from third party such as our service providers
- Personal Information from the Data Controller such as your employer
- Personal Information you provide when you use our website activ8.activpayroll.com, including but not limited to Personal Information you provide when you register to become a user of our services
- Personal Information submitted pursuant of transactions made by you through our site
- Information provided through your visits to our site, which includes without limitation weblogs, resources you access and other communication data.

Cookies and Tracking Technologies

In accordance with applicable law, activpayroll may use commonly-used tools to recognise your visit and track your interactions with our Services such as cookies and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.

In addition, we may obtain information about your computer, which includes your IP address and browser type where available. This accumulation of data is used to assist system administration where the collection of this data does not identify any personal identifiable information about you.

Service Providers

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related tasks or to assist us in analysing how our Service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are both contractually and legally obligated not to disclose or use it for any other purpose.

activpayroll shall not subcontract its processing operations performed on behalf of the customer without the prior consent of the data controllers and we shall remain liable for the data throughout the processing.

Cross Border Transfer

activpayroll is a global organisation providing services in over 75 countries. We have developed global data security practices to ensure that your information is protected and that in addition to local in-country requirements we also adhere to stringent best practices on a global basis.

As part of activpayroll's global operation we may transfer and access information from around the world in order to facilitate our global operations. This Privacy Policy shall apply to all of our global locations and operations irrespective of the country of origin of the information.

We shall only transfer information cross border when there is an absolute requirement to do so as part of delivering services to our customers and only when our customers are aware and have authorised the transfer of the information. Following data security principals, we shall transfer the minimum amount of information necessary to allow us to deliver the services.

Cross border information transfer shall only occur via secure conduits and only once we have verified that any third parties receiving information comply with all in-country data protection legislation and in addition apply data protection best practices which may surpass national requirements.

Customer Responsibility

activpayroll receives and processes customer data solely in order to deliver the services to our customers under the direction and instruction of our customers. As such activpayroll has no direct control or ownership of the data and we act entirely as the Data Processor. Our customers are responsible for complying with applicable legislation prior to and during the transfer of information to us. It is the Data Controller's responsibility to obtain all necessary consents and approvals prior to transferring information to us for processing taking into consideration any cross border transfers

which may be required in order for activpayroll to deliver the services in accordance with your requirements and instructions.

Individuals Rights

If you have submitted personal information to activpayroll, under most circumstances you have the right to reasonable access to that data to correct any inaccuracies. You can also make a request to update or remove information about you by contacting privacy@activpayroll.com and we will make all reasonable and practical efforts to comply with your request, providing your request is consistent with applicable laws and professional standards.

In accordance with our acknowledgement regarding your right to access your personal data, if you are an employee of a customer and you seek access, or seek to correct, amend, or delete inaccurate data, you may direct your request to your employer, as only the Data Controller has administrative rights to action these changes. activpayroll will promptly notify the Data Controller about any request received directly from the data subjects without responding to that request, unless it has been otherwise authorised to do so.

If our customer or any employee thereof requests activpayroll to remove any personal information to comply with data protection regulations, activpayroll will respond to the request within thirty (30) business days.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Data Retention

We shall retain the information provided by you in order for us to deliver the services in accordance with legal requirements and your instructions with national legal requirements taking precedence. We shall always retain the information for the minimum period possible or instructed by you and at the end of that period we shall ensure that the data is destroyed to a level that it cannot be reconstructed

EU-US Privacy Shield Framework

activpayroll complies with the EU-US Privacy Shield Framework, as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries.

activpayroll has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

To learn more about the EU-US Privacy Shield Framework, and to view activpayroll's certification, please visit: <https://www.privacyshield.gov/>

As part of our commitment to the EU-US Privacy Shield Framework, activpayroll:

- recognise the right for a data subject to access information held
- recognise the right of a data subject to request independent dispute resolution via an EU Data Protection Authority (DPA)
- recognise the right of a data subject to invoke binding arbitration for resolution of complaints via the Privacy Shield panel
- disclose we are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) or any other suitably authorised US statutory body (including to meet national security or law enforcement requirements) or public authority
- disclose that data subject data may be provided to third parties for localised payroll processing expertise
- retain full liability in cases of onward data transfer to third parties as detailed above

Choices and means

If you are an EEA activpayroll Website Visitor or EEA Business Contact, if at any time after registering for information, your personal data changes, you change your mind about receiving information from us, wish to cancel your account or request that activpayroll no longer use your information to provide you services, contact us via the contact information in the "Contact Us" section below. You may choose to unsubscribe from our marketing communications by following the instructions or unsubscribe mechanism in the message you received. We will retain and use your information for as long as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

activpayroll may also process your Personal Data in accordance with the contractual agreements in place with our customers. Individuals who would like to request that their personal data not be used for specific purposes or disclosed should contact their employer (the data controller).

Policy Changes

activpayroll reserve the right to the amendment or update of this policy at any time to take into account both legislative changes and incorporation of enhanced working practices. The revised policy shall be posted on our website for you to access and review.

We encourage you to periodically review this Privacy Policy to ensure you are always aware of what information we collect, how we use it and how we protect your data.

Contact Us

activpayroll has a dedicated Information Security Officer. If you believe your services have not been delivered in a manner consistent with this policy or you have questions or requests regarding this Privacy Policy please contact our information Security Officer at:

Information Security Officer
activpayroll Ltd
Unit 5 Cults Business Park
Station Road
Cults
Aberdeen
UK
AB15 9PE

or privacy@activpayroll.com

Questions or Complaints

You can direct any questions or complaints about the use or disclosure of your Personal Data to us as noted above (Contact Us). We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your Personal Data within 45 days of receiving your complaint. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our third party dispute resolution provider at <https://ico.org.uk/concerns>.