

CBSG GLOBAL POLICY

Summary of our Privacy Policy

This is a summary of our new privacy policy which takes effect on January 25th, 2015. It covers every Casantey (CBSG) website that links here, and all of the products and services contained on those websites. The detailed policy follows the same structure as this summary and constitutes the actual legal document.

Our privacy commitment: CBSG has never sold your information to someone else for advertising, or made money by showing you other people's ads, and we never will. This has been our approach for almost 20 years, and we remain committed to can access it, and what you can do about it.

Part I – Information CBSG collects and controls

We only collect the information that we actually need. Some of that is information that you actively give us when you sign up for an account, register for an event, ask for customer support, or buy something from us. We store your name and contact information, but we don't store credit card numbers (except with your permission and in one of our secured payment gateways).

When you visit one of our websites or use our software, we automatically log some basic information like how you got to the site, where you navigated within it, and what features and settings you use. We use this information to improve our websites and services and to drive new product development.

Sometimes we receive information indirectly. If you ask about our products through one of our referral programs or reselling partners, or sign in to one of our products through an authentication service provider like LinkedIn or Google, they'll pass on your contact information to us. We'll use that information to complete the request that you made. If you engage with our brand on social media (for instance, liking, commenting, retweeting, mentioning, or following us), we'll have access to your interactions and profile information. We'll still have that information even if you later remove it from the social media site.

What we do with your information

We use your information to provide the services you've requested, create and maintain your accounts, and keep an eye out for unauthorized activity on your accounts. We also use it to communicate with you about the products you're currently using, your customer support requests, new products you may like, chances for you to give us feedback, and policy updates. We

analyze the information we collect to understand user needs and to improve our websites and services.

We're required to have a legal basis for collecting and processing your information. In most cases, we either have your consent or need the information to provide the service you've requested from us. When that's not the case, we must demonstrate that we have another legal basis, such as our legitimate business interests.

You can decline certain kinds of information use either by not providing the information in the first place or by opting out later. You can also disable cookies to prevent your browser from giving us information, but if you do so, certain website features may not work properly. We completely disable third-party cookies from all CBSG websites and products.

We limit access to your personal information to our employees and contractors who have a legitimate need to use it. If we share your information with other parties (like developers, service providers, domain registrars, and reselling partners), they must have appropriate security measures and a valid reason for using your information, typically to serve you.

The European Economic Area (EEA) provides certain rights to data subjects (including access, rectification, erasure, restriction of processing, data portability, and the right to object and to complain). CBSG undertakes to provide you the same rights no matter where you choose to live.

We keep your personal information for as long as it is required for the purposes stated in this Privacy Policy. When we no longer have a legitimate need to process your information, we will delete, anonymize, or isolate your information, whichever is appropriate.

Part II – Information that CBSG processes on your behalf

If you handle other people's data using CBSG apps, such as information about your customers or employees, you are entrusting that data to us for processing. If you use a CBSG mobile app and give the app access to your contacts and photo library, you are entrusting data to us. The data you entrust to us for processing is called service data.

You own your service data. We protect it, limit access to it, and only process it according to your instructions. You may access it, share it through third-party integrations, and request that we export or delete it.

We hold the data in your account as long as you choose to use CBSG Services. After you terminate your account, your data will be automatically

deleted from our active database within 6 months and from our backups within 3 months after that.

If you are in the European Economic Area and you believe that someone has entrusted your information to us for processing (for instance, your employer or a company whose services you use), you can request certain actions from us regarding your data. To exercise those data rights, please contact the person or company that entrusted the data to us and we will work with them on your request.

Part III – General

There are some limitations to the privacy we can promise you. We will disclose personal information if it's necessary to comply with a legal obligation, prevent fraud, enforce an agreement, or protect our users' safety. We do not currently honor Do Not Track signals from internet browsers; when a universal standard for processing them emerges, we will follow it.

Third-party websites and social media widgets have their own separate privacy policies. Always check the relevant privacy policy before sharing personal information with third parties.

You can always contact us to: ask questions about our privacy practices, request a GDPR-compliant Data Processing Addendum, alert us if you believe we have collected personal data from a minor, or ask to have your personal information removed from our blogs or forums. You can also check our [Security Policy](#) and [Privacy Policy](#)

We will contact you to let you know if we make any major changes to our privacy policy, or in the highly unlikely event that we ever decide to sell our business.

PRIVACY POLICY

This Privacy Policy statement is made by the CBSG Group consisting of all the entities listed here (collectively, "CBSG", "we", "us" or "our") and is effective as of 25th May 2018. It applies to all our divisions: CBSG, BODA, CSSRMS and DIPLOMATICHUB.

CBSG's Privacy Commitment

CBSG has worried about customer and user privacy for almost 20 years, long before it became fashionable, politically correct, or legally binding to take such a position. We ask for only the least amount of information necessary, gathering only what we believe is essential for doing business, or for the specific transaction at hand. We let customers know the information we have on them and allow them to opt out of specific engagements. But, by far, our biggest commitment is that we do not make a single dollar from advertising revenue—never have, never will—even from the free editions of our products. This means we avoid the fundamental conflict of interest between gathering customer information and fueling advertising revenue, and the unavoidable compromises in customer privacy that it brings.

The goal of this policy is to make explicit the information we gather on our customers and users, how we will use it, and how we will not. This policy is unfortunately longer than we would like, but we must unambiguously address all the relevant cases. We will try and keep the language simple and direct as much as possible.

Scope of this Privacy Policy

This Privacy Policy applies to all CBSG websites that link to it. It also applies to the products and services provided by CBSG through these websites, our mobile applications, and applications posted by CBSG on CBSG's online marketplace and in other third-party online marketplaces. This Privacy Policy does not apply to any of our websites, products or services that have a separate privacy policy.

This Privacy Policy is divided into three parts:

[Part I – Information CBSG collects and controls](#)

This part deals with how CBSG collects and uses information about website visitors, potential customers, users of CBSG's products and services, and others who contact CBSG through forms or email addresses published on or linked to our websites.

Part II – Information that CBSG processes on your behalf

This part deals with how CBSG handles data that you entrust to CBSG when you use our products and services, or when you share any personal or confidential information with us while requesting customer support.

Part III – General

This part deals with topics that are relevant to both Parts I and II, and other general topics such as CBSG's security commitments and how we will inform you when we change this Privacy Policy.

Part I – Information CBSG collects and controls

What information CBSG collects

We collect information about you only if we need the information for some legitimate purpose. CBSG will have information about you only if (a) you have provided the information yourself, (b) CBSG has automatically collected the information, or (c) CBSG has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Information that you provide us

i. Account signup : When you sign up for an account to access one or more of our services, we ask for information like your name, contact number, email address, company name and country to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account. You may also provide us with more information such as your photo, time zone and language, but we don't require that information to sign up for an account. After signing up, you will have the option of choosing a security question and an answer to the security question — if you provide these, they will be used only while resetting your password.

ii. Event registrations and other form submissions: We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product, whitepaper, or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support or to contact CBSG for any other purpose.

iii. Payment processing : When you buy something from us, we ask you to provide your name, contact information, and credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiry date and the last four digits of the credit card number. We do not store the actual credit card number. For quick processing of future payments, if you have given us your

approval, we may store your credit card information or other payment information in an encrypted format in the secured servers of our Payment Gateway Service Providers.

iv. Testimonials : When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at privacy@casantey.com

v. Interactions with CBSG : We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.

Information that we collect automatically

i. *Information from browsers, devices and servers* : When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.

ii. *Information from first party cookies and tracking technologies*: We use temporary and permanent cookies to identify users of our services and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags, scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking your activities on our websites. We only use first-party cookies and do not use third-party cookies or other third-party tracking technologies on our websites. You can learn more about the cookies used on our websites here. We also use first-party Local Storage Objects (LSOs) such as HTML5 to store content information and preferences to provide certain features.

iii. *Information from application logs and mobile analytics*: We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how your business use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

Information that we collect from third parties

i. *Signups using federated authentication service providers:* You can log in to CBSG Services using supported federated authentication service providers such as LinkedIn, Microsoft and Google. These services will authenticate your identity and give you the option to share certain personal information with us, such as your name and email address.

ii. *Referrals:* If someone has referred any of our products or services to you through any of our referral programs, that person may have provided us your name, email address and other personal information. You may contact us at privacy@casantey.com to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.

iii. *Information from our reselling partners and service providers:* If you contact any of our reselling partners, or otherwise express interest in any of our products or services to them, the reselling partner may pass your name, email address, company name and other information to CBSG. If you register for or attend an event that is sponsored by CBSG, the event organizer may share your information with us. CBSG may also receive information about you from review sites if you comment on any review of our products and services, and from other third-party service providers that we engage for marketing our products and services.

iv. *Information from social media sites and other publicly available sources :* When you interact or engage with us on social media sites such as Facebook, Twitter, Google+ and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. CBSG may also add and update information about you, from other publicly available sources.

Purposes for using information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our products and services;

- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data;
- To understand how users use our products and services, to monitor and prevent problems, and to improve our products and services;
- To provide customer support, and to analyse and improve our interactions with customers;
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of CBSG, CBSG's users, third parties and the public;
- To update, expand and analyse our records, identify new customers, and provide products and services that may be of interest to you;
- To analyse trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for and to better help them;
- To monitor and improve marketing campaigns and make suggestions relevant to the user.

Legal bases for collecting and using information

Legal processing bases applicable to CBSG : If you are an individual from the European Economic Area (EEA), our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of CBSG or a third party that are not overridden by your data protection interests, or (iii) your consent. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.

Withdrawal of consent: Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Legitimate interests notice: Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

Your choice in information use

Opt out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive notices and essential transactional emails.

Disable cookies: You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.

Optional information: You can choose not to provide optional profile information such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Who we share your information with

All CBSG group entities listed here have access to the information covered in Part I. We do not sell any personal information. We share your information only in the ways that are described in this Privacy Policy, and only with parties who adopt appropriate confidentiality and security measures.

Employees and independent contractors: Employees and independent contractors of all CBSG group entities have access to the information covered in Part I on a need-to-know basis. We require all employees and independent contractors of CBSG group entities to follow this Privacy Policy for personal information that we share with them.

Third-party service providers: We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as marketing and advertising partners, event organizers, web analytics providers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

Domain registrars : When you register a domain through CBSG from domain name registrars, we share your name and contact information such as your physical address, email address and phone number with them as per the ICANN domain registration rules.

Reselling partners: We may share your personal information with our authorized reselling partners in your region, solely for the purpose of contacting you about products that you have downloaded or services that you have signed up for. We will give you an option to opt out of continuing to work with that partner.

Marketplace application developers: When you install or purchase any application developed using CBSG's APIs that is posted on CBSG's online marketplace, your name and email address will be shared with the developer of the application, so they may engage with you directly as the provider of that application or service. CBSG does not control the use of your personal information by the developers, which will be based on their own privacy policies.

Other cases : Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

Your rights with respect to information we hold about you as a controller

If you are in the European Economic Area (EEA), you have the following rights with respect to information that CBSG holds about you. CBSG

undertakes to provide you the same rights no matter where you choose to live.

Right to access : You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared

Right to rectification : You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

Right to erasure : You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to restriction of processing : You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to data portability : You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

Right to object : You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Right to complain : You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country.

Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Part II – Information that CBSG processes on your behalf

Information entrusted to CBSG and purpose

Information provided in connection with services: You may entrust information that you or your organization (“you”) control, to CBSG in connection with use of our services or for requesting technical support for our products. This includes information regarding your customers and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). The data may either be stored on our servers when you use our services, or transferred or shared to us as part of a request for technical support or other services.

Information from mobile devices: When you elect to allow it, some of our mobile applications have access to the camera, call history, contact information, photo library, and other information stored on your mobile device. Our applications require such access to provide their services. Similarly, when you elect to provide access, location-based information is also collected for purposes including, but not limited to, locating nearby contacts or setting location-based reminders. This information will be exclusively shared with our mapping providers and will be used only for mapping user locations. You may disable the mobile applications' access to this information at any time by editing the settings on your mobile device. The data stored on your mobile device and their location information to which the mobile applications have access will be used in the context of the mobile application, and transferred to and associated with your account in the corresponding services (in which case the data will be stored on our servers) or products (in which case the data will remain with you unless you share it with us).

(All the information entrusted to CBSG is collectively termed “service data”)

Ownership and control of your service data

We recognize that you own your service data. We provide you complete control of your service data by providing you the ability to (i) access your service data, (ii) share your service data through supported third-party integrations, and (iii) request export or deletion of your service data.

How we use service data

We process your service data when you provide us instructions through the various modules of our services. For example, when you generate an invoice, information such as the name and address of your customer will be used to generate the invoice; and when you use our campaign management service for email marketing, the email addresses of the persons on your mailing list will be used for sending the emails.

Push notifications

If you have enabled notification on our desktop and mobile applications, we will push notifications through a push notification provider such as Apple Push Notification Service, Google Cloud Messaging or Windows Push Notification Services. You can manage your push notification preferences or deactivate these notifications by turning off notifications in the application or device settings.

Who we share service data with

CBSG group and third party sub-processors : In order to provide services and technical support for our products, the contracting entity within the CBSG group engages other group entities and third parties .

Employees and independent contractors : We may provide access to your service data to our employees and individuals who are independent contractors of the CBSG group entities involved in providing the services (collectively our “employees”) so that they can (i) identify, analyze and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals, and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the CBSG group.

Collaborators and other users : Some of our products or services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all of your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.

Third-party integrations you have enabled : Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service information and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

Other cases : Other scenarios in which we may share information that are common to information covered under Parts I and II are described in Part III.

Retention of information

We hold the data in your account as long as you choose to use CBSG Services. Once you terminate your CBSG user account, your data will eventually get deleted from active database during the next clean-up that

occurs once in 6 months. The data deleted from active database will be deleted from backups after 3 months.

Data subject requests

If you are from the European Economic Area and you believe that we store, use or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe.

Part III – General

Children's personal information

Our products and services are not directed to individuals under 16. CBSG does not knowingly collect personal information from children who are under 16 years of age. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you believe that a child under 16 years has provided personal information to us, please write to privacy@casantey.com with the details, and we will take the necessary steps to delete the information we hold about that child.

How secure is your information

At CBSG, we take data security very seriously. **That's why we have gotten certified for industry standards such as ISO27001:2013 and SOC 2 Type II.** We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to check our Security Policy or write to us at security@casantey.com with any questions.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by sending an email to privacy@casantey.com or by writing to: Data Protection Officer, Casantey Business Solutions Group, CBSG House, Off Adonai Lane, Adjiriganor, Accra

Locations and international transfers

We share your personal information and service data within the CBSG Group. By accessing or using our products and services or otherwise providing personal information or service data to us, you consent to the

processing, transfer, and storage of your personal information or Service Data within the United States of America, the European Economic Area (EEA) and other countries where CBSG operates. Such transfer is subject to a group company agreement that is based on EU Commission's Model Contractual Clauses.

Data processing addendum

To enable you to be compliant with the data protection obligations under the General Data Protection Regulation, we are prepared to sign a Data Processing Addendum (DPA) that is based on Standard Contractual Clauses. You can request a DPA from CBSG by completing this form. Once we get your request, we'll forward the DPA to you for your signature.

Do Not Track (DNT) requests

Some internet browsers have enabled 'Do Not Track' (DNT) features, which send out a signal (called the DNT signal) to the websites that you visit indicating that you don't wish to be tracked. Currently, there is no standard that governs what websites can or should do when they receive these signals. For now, we do not take action in response to these signals.

External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you've checked their privacy policies and assured yourself of their privacy practices.

Blogs and forums

We offer publicly accessible blogs and forums on our websites. Please be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. CBSG is not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your account with CBSG. To request the removal of your information from our blogs and forums, you can contact us at privacy@casantey.com

Social media widgets

Our websites include social media widgets such as Facebook "like" buttons and Twitter "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate in the website, and may set a cookie to enable the

widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

Disclosures in compliance with legal obligations

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.

Enforcement of our rights

We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honor our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us privacy@casantey.com. We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time, upon notifying you through a service announcement or by sending an email to your primary email address. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address. If you think that the updated Privacy Policy affects your rights with respect to your use of our products or services, you may terminate your use by sending us an email within 30 days. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy. You will not receive email notification of minor changes to the Privacy Policy. If you are concerned about how your personal information is used, you should check back at <https://www.casantey.com/privacy.html> periodically.