

HSP Group

External Data Protection Policy

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## 1) Introduction

HSP Group Inc. and its affiliated companies HSP Gateway Inc., HSP Group Global Limited, and HSP Officia Global, S.L. (here referred to as “**HSP Group**”) are committed to protecting your privacy and to developing technology, systems, and processes as appropriate that will give you the most powerful and safe online experience. This External Data Protection Policy (here referred to as the/this “**Policy**”) applies to the HSP Group website(s) and all its operations and governs data collection and usage including customer related data. By using the HSP Group website(s) (and any other medium through which HSP Group collects your data) you consent to the data practices described in this Policy.

This Policy refers to personal data/personally identifiable information (here referred to as “**PII**”) which is defined as information identifying a living person here referred to as “you” or “your” or otherwise as a “data subject”.

This Policy is applicable to HSP Group and is subject to and complies with all relevant data privacy legislation and regulatory frameworks in all countries where it processes PII or where PII is processed on its behalf. To the extent that visitors to this website or users of HSP Group’s services are EU residents and to the extent that HSP Group provides services to EU residents and/or collects data from such individuals, HSP Group is subject to the provisions of the EU ‘General Data Protection Regulation 2016/679’ (here referred to as the “**GDPR**”) which is EU-wide, and which serves to protect and enhance the rights of data subjects.

Where visitors to this website or users of HSP Group’s services are UK residents and to the extent that HSP Group provides services to UK residents and/or collects PII from such individuals then HSP Group is additionally subject to the provisions of the ‘UK GDPR’ (here referred to as the “**UK GDPR**”) and the UK Data Protection Act 2018 and any associated regulatory framework relating to UK data protection and which serves to protect and enhance the rights of UK data subjects.

Where visitors to this website or users of HSP Group’s services are residents of other countries and to the extent that HSP Group provides services to such residents and/or collects data from such individuals then the data laws relevant to those other countries are applicable.

All laws applicable to the processing of personal data are referred to in this Policy as the “**Data Protection Laws**”.

## 2) HSP Group - Who We Are

HSP Group helps companies manage their international operations and expand globally.

HSP Group provides HQ-based Finance, Tax, Legal and HR personnel with a simplified, turnkey approach to ensure efficient operations, full compliance with local regulations, and needed consistency across each geography.

### 3) Collection of your PII

HSP Group collects PII such as your email address, name, home or work address or telephone number. HSP Group also collects anonymous demographic information which is not unique to you such as your ZIP code, age, gender, preferences, interests, and favorites.

Where HSP Group is providing a service and it is necessary to collect PII, the data collected and processed will include all such data as may be necessary for the fulfillment of HSP Group's professional services engagement.

HSP Group is committed to respecting and protecting your privacy and wants you to feel secure when engaging us for services, visiting our websites and providing information to us. In order to provide you with relevant information, respond to your requests, and increase the benefits you receive from our website and services, we sometimes request that you provide us with PII about yourself as referred to above.

We have prepared this Policy to inform you of the PII we collect or can sometimes collect, and how it can be used. You should also note that HSP Group maintains the same privacy practices with respect to PII that is collected off-line, and this Policy may be relied upon with respect to those methods of PII collection and use.

Where HSP Group transfers PII from within the EU or the UK to third countries it will do so pursuant to such mechanisms as are validated by the regulatory requirements of the GDPR for such international transfers including but not necessarily limited to the use of EU 'Standard Contractual or 'Model' Clauses' as appropriate or the 'International Data Transfer Agreement' process if from within the UK and/or the EU/UK-US Privacy Shield, as applicable.

### 4) Legal basis for and legitimate interest in processing any PII

To meet HSP Group's legal and contractual obligations to customers, and to also respond to product marketing and technical assistance enquiries where relevant.

### 5) Consent and lawful bases for processing

Through accepting this Policy, you are acknowledging and explicitly consenting to HSP Group processing your PII for the purposes mentioned in this Policy. You may withdraw your consent at any time by notifying such withdrawal of consent to [privacy@hsp.com](mailto:privacy@hsp.com).

HSP Group in any event relies upon Article 6 GDPR (or its equivalent under any other applicable Data Protection Laws) as providing the legal basis (or bases) for the processing of PII where such processing is necessary to enable HSP Group to render the agreed contracted services under the relevant Services Agreement and in accordance with the Data Processing Agreement ("DPA") found here <https://hsp.com/wp-content/uploads/2024/01/HSP-DPA-Jan-19-2024.pdf> (except to the extent that the DPA is not relevant for other contractual reasons).

### 6) How do we use the PII we gather?

When we collect information about you it is our intention to tell you why we are asking for the PII and what we intend to do with it.

- i. Where you are a general visitor to HSP Group's website, you will always have the option of not providing the information in which case you will still be able to access other portions of this website although you may not be able to access certain functionalities of this website. In certain areas of our website, we may, where appropriate, enable you to "opt-out" of certain uses of your information or elect to not receive future communications.

The information we collect about you, or your computer, will be used to operate our website and to provide customer support, respond to your requests or process any transactions you have authorized. It may also be used to verify your identity, send you information or contact you in relation to an HSP Group product or service that you are using or that we believe may be of interest to you.

There is also information about your computer hardware and software that is automatically collected by HSP Group. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used by HSP Group for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the HSP Group website.

Please keep in mind that if you directly disclose PII or personally sensitive data through HSP Group public message boards, this information may be collected and used by others. Note: HSP Group does not read any of your online communications on these message boards.

HSP Group is not responsible for the privacy statements or other content or websites outside of the HSP Group family of websites.

- ii. Where you are a prospect or existing customer, or user of HSP Group's professional services (as detailed in the applicable Services Agreement) HSP Group will process your PII as necessary to render the contracted services and activities ancillary to the contracted services, including but not limited to, performing "know your client" / anti-money laundering inquiries and ongoing monitoring, improving the services, managing your account, responding to service requests or questions or concerns, invoicing and collections purposes, and to suggest services to you. Information and documents collected for "know your client" / anti-money laundering purposes may also be shared by HSP Group with its third-party service specific vendors / subcontractors to the extent such third-party service specific vendors / subcontractors also need to perform "know your client" / anti-money laundering inquiries and ongoing monitoring.

HSP Group may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

HSP Group does not sell, rent, or lease its customer lists or other PII to third parties. HSP Group may from time to time contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your PII (email, name, address, telephone number) is not transferred to the third party. In addition, HSP Group may, subject to any restrictions under applicable contractual arrangements and/or Data Protection Laws, share PII with trusted partners, including but not limited to the following purposes:

- To help HSP Group perform statistical analysis,
- To send you email postal mail or arrange for deliveries,

- To provide customer support or as required for the provision of contracted professional services,
- In connection with the maintenance and improvement to the services and systems,
- In connection with any third-party auditors or other external professional advisors,
- To comply with a legal order or to comply with legal process served on HSP Group,
- To protect and defend the personal safety of users of this website and/or of HSP Group’s customers or of the public.

All such third parties are prohibited from using your PII except to provide these services to HSP Group and they are required to maintain the confidentiality of your information.

HSP Group does not use or disclose sensitive PII such as race, religion, or political affiliations without your explicit consent unless otherwise permitted by applicable Data Protection Laws.

HSP Group keeps track of the websites and customers visiting within HSP Group in order to determine what HSP Group services are the most popular. This data is used to deliver customized content and advertising within HSP Group to customers whose behavior indicates that they are interested in a particular subject area.

## 7) Sub-processors

HSP utilizes both infrastructure and services specific vendors to provide its services. The selection of services specific vendors is dependent upon the particular services engaged under the applicable Services Agreement and they will be identified at the relevant time.

To be able to provide specific functionalities within its website and services, HSP utilizes certain infrastructure third-party vendors. These entities are sub-processors with access to PII and such vendors are listed below:

<b>Sub processor</b>	<b>Country where the Sub processor is located</b>	<b>Country where Sub processor stores/hosts PII</b>	<b>Activities performed by Sub proc</b>
Microsoft Corporation	United States	United States	Email, Identity/Account Management for Security Purposes (single sign-on and
Salesforce, Inc.	United States	United States	Storage of Contract and Company Information (Customer
Freshworks Inc.	United States	United States	Ticketing & Information Exchange
Bubble Group, Inc.	United States	United States	Platform Integration
monday.com Ltd.	Israel	United States Germany (Resilience)	Business Process Management Work Management (Workflow
PAYSLIP LIMITED	Ireland	Dublin, Ireland	Payroll data storage and management

3Pillar Global Inc.	United States	India	Support, Software Engineering & Development Services
MongoDB, Inc.	United States	United States	Database Support Services
WorkOS, Inc.	United States	United States	Single Sign-On

Each of HSP Group Inc, and its affiliates as defined in paragraph one of this Policy may also from time to time provide its services as a Sub-processor depending upon the particular services engaged under the applicable Services Agreement.

## 8) Use of Cookies

The HSP Group website uses “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize HSP Group pages or register with HSP Group site or services, a cookie helps HSP Group to recall your specific information on subsequent visits. This simplifies the process of recording your information such as billing addresses, shipping addresses, and so on. When you return to the same HSP Group website the information you previously provided can be retrieved so you can easily use the HSP Group features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies you may not be able to fully experience the interactive features of the HSP Group services or web sites you visit.

## 9) Can you update and/or amend the PII you have provided?

You are entitled to know whether or not we hold information about you and if we do (subject to certain limitations) to have access to that information and to have it corrected if it is inaccurate or out of date.

If you are an EU resident or a UK resident and we are in possession of or are processing your PII or in relation to offering you services, you have the following rights under the GDPR/UK GDPR:

- Right of access - you have the right to request a copy of the information that we hold about you
- Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete
- Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records

- Right to restriction of processing - where certain conditions apply you have a right to restrict the processing
- Right of portability - you have the right to have the data we hold about you transferred to another organization
- Right to object - you have the right to object to certain types of processing such as direct marketing
- Right to object to automated processing including profiling

In the event that HSP Group refuses your request under rights of access, we will provide you with a reason as to why, which you will have the right to legally challenge.

To access what PII is held about you, identification will be required.

HSP Group will accept the following forms of ID when information on your personal data is requested:

- A copy of your driving license, passport or birth certificate and a utility bill not older than three months.

A minimum of one piece of photographic ID listed above and a supporting document is required. If HSP Group is dissatisfied with the quality of the ID presented, further information may be sought before any PII is released.

To the extent that your PII falls outside the jurisdiction of the EU/UK GDPR you may have similar rights under other global Data Protection Laws in which event please contact HSP Group at [privacy@hsp.com](mailto:privacy@hsp.com) should you wish to exercise any of your permitted rights.

## 10) Security of your PII

HSP Group secures your PII from unauthorized access, use or disclosure. HSP Group secures the PII you provide on computer servers in a controlled, secure environment protected from unauthorized access, use or disclosure. When PII is transmitted to other websites, it is protected through the use of encryption such as the Secure Socket Layer (“SSL”) protocol. We have taken appropriate steps to safeguard and secure information we collect online including the use of encryption when collecting or transferring sensitive data.

However, you should always take into consideration that the Internet is an open forum, and that data may flow across networks with little or no security measures and therefore we cannot guarantee that such information may not be accessed by people other than those you intended to access it.

## 11) Changes to this Policy

HSP Group may from time to time update this Policy. Updates to this Policy will be posted to this URL and will be effective when posted. If HSP Group makes any material changes, we will notify you by means of a conspicuous notice on this Website or via e-mail, but HSP Group encourages you to review this Policy periodically to keep up to date on how we use your PII. You should frequently visit this Policy to stay fully informed. Your continued use of our websites or the service(s) following the posting of any amendment, modification, or change to this Policy shall constitute your acceptance of the amendments to this Policy.



## 12) Data Retention

We apply data retention terms as required under the applicable laws of the country(/ies) where your data is being processed. Where applicable laws do not determine otherwise, a data retention term of ten (10) years is applied commencing on the date of termination of our engagement with you for whatever reason.

## 13) Contact Information

HSP Group welcomes your comments regarding this Policy. If you have any questions regarding this Policy, please contact HSP Group at [privacy@hsp.com](mailto:privacy@hsp.com). In the event that you wish to make a complaint about how your PII is being processed by HSP Group, please contact HSP Group at [privacy@hsp.com](mailto:privacy@hsp.com). If you do not get a response within 30 days, you can contact the relevant national regulator.