

Privacy and Cookies Notice

GENERAL INFORMATION

This Privacy and Cookies Notice covers the services that Fuse International Limited ("Fuse") provides to its customers and any individuals such customers permit to access the Fuse service ("Users").

Fuse treats Users' privacy and the confidentiality of their personal data as a matter of priority. Users' personal information will be processed in accordance with the Data Protection Act 2018 (UK) and the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR").

The purpose of this notice is to provide transparency and information outlining what personal data may be collected when using the Fuse service and how Fuse processes, uses and protects this data.

This policy also explains what cookies are written and how they are used by the Fuse service and/or Fuse.

If you have any questions this notice, you may contact us via the details provided under the "How to contact us" heading below.

CHANGES TO THE PRIVACY AND COOKIES NOTICE

Fuse reserves the right to modify or update this Privacy and Cookies Notice at any time. Users must therefore read it carefully, as it may have been subject to unannounced modifications that took effect on the date indicated therein.

PRIVACY NOTICE

WHY DO WE COLLECT YOUR DATA?

Fuse is a learning and collaboration platform that requires an authenticated account in order for Users to access it.

The use of information collected through the Fuse service shall be limited to the purpose of providing the service for which the customer has engaged Fuse.

We do not seek to collect sensitive personal data through this site that is outside of the scope of providing and supporting the Fuse service and associated functionality.

WHAT DATA DO WE COLLECT AND HOW

When you use the Fuse services Fuse will collect, store and use certain personal information that you disclose to us. The information that is collected will include session information and your activity on Fuse. We may also collect details of your computer's internet protocol address, email address, username and other details stored as part of your user profile settings.

We do this in two principal ways:

1. Information you provide voluntarily through registration: Prior to using Fuse, you will be required to have an individual user account. If you are using Fuse as a business user, your account may have been created for you by your organisation. If you have signed up to Fuse directly then you control what personal information is kept as part of your user account profile. Failure to fill in information may prevent access to Fuse and failing to maintain accurate information may result in termination of access to all Fuse services.

2. Information that we collect automatically through technology: We also collect information such as IP address, connection speed and internet service provider domain name. This information is collected through a variety of methods:

- **Cookies:** Small files stored on your hard drive to collect Fuse session information. Most browsers accept these automatically, but certain aspects of website functionality may be unavailable to you if you disable or refuse to accept cookies.

Our site collects information about your computer, including (where available) your IP address, operating system and browser type, for system administration and analytical purposes.

The Fuse service tracks all user activity and site visits such as content uploads and downloads, views of content, videos, courses, quizzes, links, questions, images and documents. In addition, Fuse tracks progress and completion data for all training activities on Fuse.

- **Local Storage:** Some Fuse functionality such as screen recordings and custom widget data may be written to the user's local profile on their device.

We will only collect any additional personal data on the instruction of the organisation that is the Fuse customer, the relevant organisation, with any subsequent processing of this data specifically for the purposes of the organisation, as the data controller.

WITH WHOM DO YOU SHARE MY PERSONAL DATA?

We may disclose your personal information to the following categories of recipients:

- to our **third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are

described in this Privacy and Cookie Notice or notified to you when we collect your personal information.

- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

HOW LONG WILL YOU KEEP MY DATA?

Your data will be stored for the length of time necessary to fulfil the purpose for which it was collected and/or to process your request. If your data is used for several purposes that require it to be kept for different periods of time, the longest storage period will apply.

When your data is no longer necessary, access to said data will be limited to compliance with strictly legal obligations or it will be destroyed in a secure manner.

HOW DO WE STORE THE INFORMATION?

Fuse stores personal data received from our customers and Users within the European Economic Area, save where strictly necessary for the performance of our obligations and where such transmission complies with the data protection laws. For such international transmissions we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy and Cookie Notice.

HOW DO YOU PROTECT MY DATA?

Fuse is committed to information security and has defined security policies and procedures to guarantee the confidentiality of your data. We are audited around this annually.

The Fuse service utilises third party services (sub-processors) to provide certain services and functionality. This may require access to and/or processing of your personal data by these third parties as data sub-processors. In all cases, however, third parties are required to comply with current legislation and Fuse's security policies and must guarantee that they will use the information in accordance with Fuse's instructions and implement the appropriate technical and organisational measures to guarantee the security of the information.

WHAT ARE MY RIGHTS CONCERNING MY PERSONAL DATA?

You may, at any time, exercise your right to access, rectify, erase your data, or to restrict or oppose the processing thereof, and, where appropriate, revoke the consent you provided, under the terms set forth in the current regulations.

Fuse has no direct relationship with Users or any other individuals whose personal data it processes in the provision of the services. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data or exercise any other data subject rights should direct their query to the relevant Fuse customer (the data controller).

In order to do so, as a corporate or business user of Fuse you should contact your organisation's Fuse administration team.

[If you are a self-registered user then you can contact the organisation that is the relevant Fuse customer.

Any individuals that wish to obtain more information about the data collected by Fuse can do so via the contact details provided under the "How to contact us" heading below.

If requested to remove data, Fuse will respond within a reasonable timeframe.

COOKIES POLICY

WHAT ARE COOKIES?

Cookies are small files that are stored on devices used to access websites (e.g. computers, smartphones and tablets) and that contain certain information. There are different types of cookies.

Depending on the entity that manages the equipment or domain from which the cookies are sent and that processes the data obtained, these can be:

- Own cookies: those that are sent to the User's device by Fuse and from which the service requested by the User is provided;
- Third-party cookies: those that are sent to the User's device from equipment or a domain that is not managed by Fuse, but by another entity that processes the data obtained through cookies.

Depending on the time they remain active on the terminal equipment, these can be:

- Session cookies: those that are designed to collect and store data while the User accesses a website and remain on the User's device as long as the visit lasts (e.g. until the browser is closed or until the user logs out);
- Permanent cookies: those that are stored on the device and can be accessed and processed for a period defined by the person responsible for the cookie, which can last from a few minutes to several years.

WHAT COOKIES DOES THIS WEBSITE USE?

Our cookies do not store sensitive personal information such as your name, email or other user details: they simply hold the 'key' that, once you have signed in you are associated with this information. However, if you'd prefer to restrict, block or delete cookies, or any other website, you can use your browser to do this via the details provided under the heading "How can I manage my cookies" below.

The following list outlines the cookies we use, and what we use them for:

" <i>_fuse_session</i> "	- Contains user session id used for persisting user session. Duration for life of the session.
" <i>fusion-tips</i> "	- Cookie used for tracking closed tips by user. Duration 1 year.
" <i>user_verify</i> "	- Used for verifying user session in HTTPS to protect from using session id outside of secure connection. Duration for life of session.
" <i>_dd_r</i> "	- DataDog cookie used to provide Fuse web performance analytics. Duration for 1 day.
" <i>_dd</i> "	- DataDog cookie used to provide Fuse web performance analytics. Duration for 1 day.
" <i>_dd_s</i> "	- DataDog cookie used to provide Fuse web performance analytics. Duration for 1 day.
" <i>PF_</i> "	- If SSO is enabled you may see this Ping Federate cookie which maintains SSO IDP session information. Duration for life of session.

HOW TO CONTACT US?

If you have any questions or concerns about our use of your personal information, please contact us on dpo@fuseuniversal.com