

HSP Group

External Data Protection Policy

February 1, 2022

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1) Introduction

HSP Group and all its affiliated companies (here referred to as “HSP Group”) is 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 Privacy Notice applies to the HSP Group website and governs data collection and usage. By using the HSP Group website (and any other medium through which HSP Group collects your data) you consent to the data practices described in this Statement.

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

This privacy notice 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 data or where data is processed on its behalf. To the extent that visitors to this website are EU residents and to the extent that HSP Group provides goods and/or 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.

Post 1 January 2021, to the extent that visitors to this website are UK residents and to the extent that HSP Group provides goods and/or services to UK residents and/or collects data 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.

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 Personal Information

HSP Group collects personally identifiable information 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.

HSP Group is committed to respecting and protecting your privacy and wants you to feel secure when visiting our sites 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, we sometimes request that you provide us with information about yourself as referred to above.

We have prepared this Privacy Notice to inform you of the information we gather or can sometimes gather, and how it can be used. This Notice applies to all HSP Group websites that display or link through any associated third-party website to this Privacy Notice. You should also note that HSP Group maintains the same privacy practices with respect to data that is collected off-line, and this Notice may be relied upon with respect to those methods of data collection and use.

Where HSP Group transfers data from within the EU back to the United States 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.

4) Legal basis for and legitimate interest in processing any personal data

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

5) Consent

Through agreeing to this Privacy Notice you are consenting to HSP Group processing your personal data for the purposes mentioned in this Privacy Notice

6) How do we use the information we gather?

When we collect information about you it is our intention to tell you why we are asking for the information and what we intend to do with it. You will 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 programs or services. 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 or services.

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 personally identifiable information 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 encourages you to review the privacy statements of websites you choose to link to from HSP Group so that you can understand how those websites collect, use, and share your information. HSP Group is not responsible for the privacy statements or other content on websites outside of the HSP Group family of websites.

7) Use of your Personal Information

HSP Group collects and uses your personal information to operate the HSP Group website and deliver the services you have requested. HSP Group also uses your personally identifiable information to inform you of other products or services available from HSP Group and its affiliates. 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 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 unique personally identifiable information (email, name, address, telephone number) is not transferred to the third party. In addition, HSP Group may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support or arrange for deliveries. All such third parties are prohibited from using your personal information 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 personal information such as race, religion, or political affiliations without your explicit consent.

HSP Group keeps track of the websites and pages our customers visit 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.

HSP Group websites will disclose your personal information without notice only if required to do so by law or in the good faith belief that such action is necessary to:

- a) Conform to the edicts of the law or to comply with legal process served on HSP Group or the site, or,
- b) Protect and defend the personal safety of users of HSP Group or of the public.

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 personal 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 personal information 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 post 1 January 2021 a UK resident) and we are in possession of or are processing your data or in relation to offering you goods and/or a service or 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 personal data 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 personal data is released.

10) Security of your Personal Information

HSP Group secures your personal information from unauthorized access, use or disclosure. HSP Group secures the personally identifiable information you provide on computer servers in a controlled, secure environment protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) 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 such as credit card information.

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 Statement

HSP Group will occasionally update this Statement of Privacy to reflect company and customer feedback. HSP Group encourages you to periodically review this Statement to be informed of how HSP Group is protecting your information.

12) Contact Information

HSP Group welcomes your comments regarding this Statement of Privacy. If you believe that HSP Group has not adhered to this statement, please contact HSP Group at privacy@hsp.com We will use commercially reasonable efforts to promptly determine and remedy the problem.

13) Complaints

In the event that you wish to make a complaint about how your personal data is being processed by HSP Group, you have the right to complain to HSP Group at privacy@hsp.com

If you do not get a response within 30 days and you are an EU or UK resident, you can in the first instance complain to the relevant EU national regulator.

Revision History

Version Reviewed	Key Changes Made	Changed By	Date Re-issued
V1	ORIGINAL	February 1, 2022	N/A