

INNOVATION SOFTWARE

CREDITFORCE

GDPR
PRIVACY STATEMENT &
MORAL COMPASS



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Innovation Software Limited is committed to upholding the law and values espoused in the Statements set out below which apply to:-

- Our Privacy Statement
- Our Diversity and Inclusion Commitment
- Our Trade Sanctions Statement
- Our Anti-Bribery and Corruption Statement
- Our Modern-Day Slavery Statement
- Our Environmental Commitment Statement



OUR PRIVACY STATEMENT

Introduction

Innovation Software Limited is strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data. It also provides information about individuals' rights. It applies to personal data given to Innovation Software by the individuals or by 3rd parties about:-

1. Clients - Personal information about Individuals within client organisations.
2. Prospective clients – personal information about individuals within prospective client organisations.
3. Visitors to our Website.

We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated when it is collected.

Controller

This privacy policy is issued on behalf of Innovation Software Limited. This is the company responsible for processing your personal data as the controller and is responsible for personal data collected via our website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Controller Contact details

Full name of legal entity: Innovation Software Limited

Name and title of DPO: Caroline Lyons, Director of Client Services

Email address: caroline.lyons@innovationsoftware.uk.com

Postal address: Innovation Centre, F26, Maidstone Road, Chatham, Kent, ME5 9FD

Telephone number: +44 (0)1 634 812300.

Transparency

When collecting and using personal data, our policy is to be transparent about the reasons why we collect it and how it is processed. This is described in the relevant sections below.

The Personal data we collect

The collection of personal data about contacts and the storage of that personal data in our systems will include:-

- Name and Job Title
- Employer name
- The nature of your Employer's Business
- Your work address
- Contact title, and Job Title
- Main Work Telephone number
- Direct and Mobile telephone numbers
- Email address

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- Recordings using Microsoft Teams in which you have participated to store records of Presentations and Project Meetings so we can communicate better with you.

How we collect personal data

We collect Marketing and Communications Data about individuals via our Website. We may also use professional social media sites, such as LinkedIn, to contact you via that platform or share your content.

We may also collect Data from publicly available sources such as Companies House.

We will collect Personal information about our Clients' employees at the commencement of our relationship with the Client.

Our policy is to collect only the personal data necessary for the purposes described below.

How we use personal data of employees or individuals associated with our clients

Our use of your personal data is subject to your instructions, and Lawful Purposes as defined by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act, 2018, any replacement legislation in force in the United Kingdom from time-to-time (the data protection legislation) and our duty of confidentiality owed as regulated solicitors.

We use the information you provide primarily to provide Software and Services to our clients, but we may also use it for other purposes including:-

- updating and enhancing client and third-party records;
- analysis to help us manage our Company
- call recording using Microsoft Teams either for Product Presentations or Project Management Meetings – your information will be kept confidential at all times
- contacting you for the purpose of investigating opportunities for further processing or consent.

We use personal data for the following purposes:-

- Providing our Software and services - Our services cover the provision of, implementation, and training in the use of our Software Products.
- Security, quality and risk management activities - We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.
- Complying with any requirement of law, or regulation-As with any Business, we are subject to legal, obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing our software and services for other lawful purposes, including analysis to better

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understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings and to develop new Innovation Software Limited technologies and offerings. To the extent that the information that we receive in the course of providing professional services contains personal data, we will remove the personal data prior to using the information for these purposes.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 6 years from the end of our relationship with a Client.

Disclosure of your personal data

Our policy is not to share your Personal Data with 3rd Parties other than it may reside on our Marketing CRM, our Azure 365, and Accounting system, and Freshworks Support System for Users of our Software.

Your personal data will always be used on a Lawful Basis, but may need to be shared for the following reasons: -

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Our Personnel and Recruitment Applicants

We collect personal data concerning our own personnel as part of the administration, management and promotion of our business activities.

Recruitment applicants

When applying online for a role at Innovation Software Limited via the Innovation Software Limited website, applicants should refer to the information made available when applying for a job for details about why and how personal data is collected and processed.

Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)

Collection of Supplier Personal data

We collect and process personal data about our suppliers (including sub-contractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers.

Use of Supplier Personal Data

We use personal data for the following purposes:

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Receiving services

We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal data about those individuals that are providing services to us.

Providing professional services to clients

We do not use Sub-Contractors to provide services to our Clients.

Administering, managing and developing our businesses and services

Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security to threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. .

Providing information about us and our range of services

Unless we are asked not to, we use business contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invitations to Webinars and other events.

Visitors to our offices

We have security measures in place at our offices.

We require visitors to our offices to sign in at reception and keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).

Visitors to our website

Collection of personal data

Visitors to our websites are generally in control of the personal data shared with us. We do not capture any information via the use of cookies on our website.

We receive personal data, such as name, title, company address, email address, and telephone numbers, from website visitors; for example when an individual subscribes to updates from us.

Visitors are also able to send an email to us through the website. Their messages will contain the user's screen name and email address, as well as any additional information the user may wish to include in the message.



Use of personal data

When a visitor provides personal data to us, we will use it for the purposes for which it was provided to us as stated at point of collection (or as obvious from the context of the collection). Typically, personal data is collected to:

- register for certain areas of the site;
- subscribe to updates;
- enquire for further information;
- distribute requested reference materials;
- submit curriculum vitae;
- monitor and enforce compliance with our terms and conditions for use of our website;
- administer and manage our website, including confirming and authenticating identity and preventing unauthorised access to restricted areas, premium content or other services limited to registered users; and
- aggregate data for website analytics and improvements.

Unless we are asked not to, we may also use your data to contact you with information about Innovation Software Limited's business, services and events, and other information which may be of interest to you. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on the appropriate webpage, in our communication to the individual, or the individual may contact us by email with the subject line "Unsubscribe Me" to: caroline.lyons@innovationsoftware.uk.com

Our websites do not collect or compile personal data for the dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties. If there is an instance where such information may be shared with a party that is not an Innovation Software Limited member firm, the visitor will be asked for their consent beforehand.

Data retention

Personal data collected via our websites will be retained by us for as long as it is necessary (e.g. for as long as we have a relationship with the relevant individual).

Your Legal Rights

Under data protection laws you may have the following rights in relation to your personal data.

1. Request access to your personal data

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

2. Request correction of your personal data

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us

3.

Request erasure of your personal data

Request erasure of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right



to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. We may not always be able to comply with your request of erasure for specific legal reasons about which we will notify you, if applicable, at the time of your request.

4. **Right to withdraw consent**

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact: caroline.lyons@innovationsoftware.uk.com



OUR DIVERSITY AND INCLUSION COMMITMENT

Innovation Software believe that diversity and inclusion are essential for our success as a global company. We recognise and celebrate the value of each individual’s unique contributions and perspectives, and we strive to create a culture of “belonging” —where everyone can thrive.

We are committed to overseeing the following:

- Providing equal opportunities for all our employees, regardless of their age, disability, gender identity, marital status, pregnancy, race, religion, sex, sexual orientation, or any other protected characteristic.
- Promoting a respectful and supportive work environment that is free from any form of discrimination, harassment, bullying, or victimization.
- Encouraging and supporting the professional development and career advancement of our diverse talent pool.
- Engaging with our customers, suppliers, partners, and communities in a way that reflects our values and respects their diversity.
- Measuring and reporting on our progress and performance on DEI matters and holding ourselves accountable for continuous improvement.

We expect all our employees, managers, leaders, and stakeholders to uphold this policy and contribute to creating an inclusive workplace where everyone can be themselves and perform at their best.



OUR TRADE SANCTIONS STATEMENT

We are committed to overseeing the following:

Innovation Software Limited a Company registered in England and Wales and having the registered number 1670041 and whose registered office address is Innovation Centre Unit 26 Maidstone Road Chatham Kent ME5 9FD hereby certify that we are aware of and comply with the trade sanctions imposed by the UK Government and other relevant authorities on the trade of goods, technology and services with certain countries, entities or individuals.

- We confirm that we do not engage in any activity that violates or circumvents these trade sanctions, directly or indirectly, knowingly or unknowingly.
- We further confirm that we have conducted due diligence on our customers, suppliers, partners and intermediaries to ensure that they are not subject to any trade sanctions or involved in any prohibited or restricted transactions.
- We understand that failure to comply with these trade sanctions may result in criminal penalties, civil fines, loss of export privileges, reputational damage and other adverse consequences.
- We declare that the information provided in this statement is true and accurate to the best of our knowledge and belief.



OUR ANTI-BRIBERY AND CORRUPTION STATEMENT

We are committed to overseeing the following:

- The prevention of bribery by those employed and associated with it and is committed to carrying out business fairly, honestly and openly, with zero-tolerance towards bribery.
- The Company expressly prohibits employees from offering, promising, giving, or requesting, agreeing to receive or receiving any financial or other advantage to another person or business with the intention of gaining an improper financial or other advantage.
- All employees have a responsibility to prevent, detect and report all instances of bribery.
- All staff are asked not to accept if offered any gift or hospitality, without first approval from the company.
- All staff are told never to offer a gift or hospitality to a customer, supplier or other person with the intention of gaining a business advantage. Any business gifts or invitations to hospitality events that are issued must always be agreed in advance.
- Acts of bribery and/or corruption will always be taken seriously and come with severe consequences for both our staff and us as a company. Our staff are informed of their duty to disclose any concerns about bribery (or any other unlawful activity) whether in relation to themselves, other staff members, contractors or suppliers. They must report concerns in confidence, to the Company as soon as practicable.
- If a member of staff is found to have accepted or given any bribe, it may result in disciplinary action up to and including dismissal. This may also lead to criminal investigation and potential prison sentence and fine for those found guilty of bribery in addition to potential fines for the Company.



OUR MODERN-DAY SLAVERY STATEMENT

We are committed to overseeing the following:

Modern Slavery is a crime and violation of Human Rights. Innovation Software is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or any of our supply chains. Innovation Software is committed to playing any role it can in its operations to tackling Modern Slavery. The following outlines Innovation Software's policy in relation to compliance with the Modern Slavery Act (UK) and it applies to all Innovation Software operations and locations.

Policy Principles

Innovation Software is a leading provider of intelligent Collections Management Systems and Business Intelligence tools; offering trusted technology-led solutions to global enterprises. In compliance with the Modern Slavery Act (UK) 2015, Innovation Software offers the following statement internally and externally on our website regarding our efforts to prevent slavery and human trafficking in how we conduct our business and in our supply chain.

Our Supply Chain Due Diligence and Monitoring Process

Innovation Software is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Modern Slavery Act 2015, as it applies to our industry.

We recognise that modern slavery is a complex supply chain issue, and we work in partnership with our clients, suppliers and other organisations to help develop long term solutions to this issue. Therefore, our suppliers/partners must also have equivalent policies regarding the prevention of human trafficking and slavery within their own organisation and supply chain for us to partner with them. We monitor and assess all potential suppliers on this basis.

Working Practices & Procedures

Innovation Software wants to ensure that the principles of this policy are then reflected in our practical day to day operations to ensure that we are doing all we can. Below are some of Innovation Software's working practices/procedures to demonstrate that we have taken account of internationally recognised labour and engagement standards in how we operate ourselves and in how our suppliers are evaluated when we choose to engage with them:

1. Prevention of forced, bonded or involuntary prison labour:
Employees who are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy then err on the



side of caution and report it in accordance with the whistleblowing policy, or contact Caroline Lyons: caroline.lyons@innovationsoftware.uk.com

Freedom of association and collective bargaining

Whilst Innovation Software is not currently a unionised environment, it has a professional HR team in place who manage any and all changes to employee terms and conditions through a structured process. Prevention of discrimination Innovation Software has a Diversity & Inclusion committee with representatives from across the business, sponsored by the CEO. Their role is to create an inclusive environment for all. Innovation Software has a number of Policies which employees are required to adhere to, which combined reinforce a culture of Trust and Empowerment where any possibility of Modern Slavery existing should be surfaced:

- Equality & Diversity Policy – designed to ensure fairness and transparency during the recruitment, promotion and in day-to-day working practices
- Prevention of Harassment & Bullying Policy – to protect our employees and to treat any examples of this occurring with the seriousness it deserves
- Whistleblowing Policy – which enables any employee with any serious concerns (including any related to Modern Slavery in the supply chain) without fear of reprisal or repercussion.

All of these are published in our Employee Handbook to reference and to comply with.

Raising Concerns

If you have any questions about this statement or any concerns about slavery or human trafficking with Innovation Software's organisation or supply chain, please contact Caroline Lyons: caroline.lyons@innovationsoftware.uk.com



OUR ENVIRONMENTAL COMMITMENT STATEMENT

Our organisation is committed to reducing our impact on the environment and supporting global sustainability goals. We recognize our responsibility to protect the planet and contribute to a better future for all.

Some of the actions we are taking to achieve this are:

- We are a paperless office as far as possible.
- Our staff work from home as much as possible avoiding the necessity to travel to and from work.
- Our projects are run remotely, avoiding the necessity to travel to client sites.
- We implement waste reduction and recycling initiatives in our office and events and seek to minimize the use of single-use plastics.
- We collaborate with our suppliers, customers and partners to promote environmental best practices and innovation throughout our value chain.
- We support verified carbon-reduction projects that benefit local communities and biodiversity.
- Our head office utilises solar lighting on highways and is continuously working towards the aim of being a carbon neutral building.

We are proud of our environmental achievements so far, but we know there is more work to be done. We are constantly looking for ways to improve our performance and make a positive difference in the world.



Russell Lyons Msc FCA, CMI.
CEO