

Privacy Policy

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This privacy notice for Asset Reality Limited ('**Company**', '**we**', '**us**', or '**our**') describes how and why we might collect, store, use, and/or share ('**process**') your information when you use our services ('**Services**'), such as when you:

- Visit our websites at <http://www.assetreality.com>, or <http://academy.assetreality.com> or any website of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing or events.

Questions or concerns?

Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@assetreality.com

SUMMARY OF KEY POINTS

This summary provides key points from my privacy notice, but you can find out more details about any of these topics by reading the privacy policy in full below.

What personal information do we process?

When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Asset Reality Limited and the Services, the choices you make, and the products and features you use.

WHAT INFORMATION DO WE COLLECT?

Do we process any sensitive personal information?

We do not process sensitive personal information.

Do we receive any information from third parties?

We do not receive any information from third parties.

How do we process your information?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

See the table of contents section titled '**How do we process your information?**' below to learn more.

In what situations and types of parties do we share personal information?

We may share information in specific situations and with specific categories of third parties. Learn more about

WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

How do we keep your information safe?

We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or

other unauthorised fair parties will not be able to defeat our security and improperly collect access deals or modify your information.

See the table of contents section titled "**Do we keep your information safe?**" below to learn more.

What are your rights?

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

See the table of contents section titled "**What are your privacy rights?**" to learn more.

How do you exercise your rights?

The easiest way to exercise your rights is by visiting www.assetreality.com, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws. If you want to learn more about what Asset Reality Limited does with the information it collects please review this privacy notice in full.

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WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In short: We collect personal information that you provide to us. We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us on our products and Services, when you participate in the activities on the Services, or otherwise when you contact us.

Personal Information Provided by You.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- email addresses (typically your work email address)
- usernames
- passwords

Sensitive Information.

We do not process sensitive information. All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected.

In short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and uses information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when we use our services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and usage data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we called in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- **Device data.** We collect device data such as information about your computer, phone, tablet, or other devices you use to access the services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the services. For example, we may use GPS and other technologies to collect the geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your location settings on your device. However, if you choose to opt-out, you may not be able to use certain aspects of the Services.

HOW DO WE PROCESS YOUR INFORMATION?

In short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.

- To request feedback. We may process your information when necessary to request feedback and to contact you about the use of our Services.
- To protect our Services. We may process your information as part of our efforts to keep our services safe and secure, including fraud monitoring and prevention.
- To identify usage trends. We may process information about how we use our services to better understand how they're being used so we can improve them.

WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In short: We only process your personal information when we believe it is necessary and when we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into all fulfil our contractual obligations, to protect your right, and to fulfil our legitimate business interests.

If you are in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal basis we rely on in order to process your personal information. As such, we may rely on the following legal basis to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fill our contractual obligations, including providing our services, prior to entering a contract with your work place organisation.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information with some of the purposes described in order to:
 - **Analyse how our Services are used** so we improve them to engage with our users
 - **Diagnose problems** and/or prevent fraudulent activities
 - **Understand how our users use our products** and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with law enforcement bodies or regulatory agencies, exercise or defend our legal rights, or disclosure of information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interest or the vital interests of a third party, such as in situations involving parental threats to the safety of any person.

WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In short: We may share information in specific situations described in this section and/or with the following categories of third parties.

Vendors, Consultants, and other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents (**'third parties'**) who perform services for us or on our behalf and require access is such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have a short time to do it. They will also not share your personal information with any organisation apart from last. They also commit to protect the data they hold

on our behalf and retain it for the period we interrupt. The categories of third parties we may share your information with are as follows:

- Government Entities
- Data Analytics Services
- Cloud Computing Services
- Performance Monitoring Tools
- Product Engineering and Design Tools
- Testing Tools
- User Account Registration & Authentication Services
- Third-party custodians and/or crypto trading firms
- Website Hosting Service Providers.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or portion of our business to another company.
- **Affiliates.** We may share your information with affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company any subsidiaries, joint venture partners or any other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In short: We may use cookies and other tracking technologies to collect and store your information. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. To understand specific information about how we use such technologies and how you can refuse certain cookies [please view our Cookie Policy](#).

IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In short: we may transfer, store, and process your information in countries other than our own. Some of our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in other facilities and by those third parties with whom we may share your personal information (see 'when and with whom do we share your personal information?') In the United States, and other countries.

If you are resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

BINDING CORPORATE RULES

These include a set of binding corporate rules BCRs established and implemented by Asset Reality Limited. Our BCRs have been recognised by EEA and UK data protection authorities as providing an adequate level of protection to the personal information we process internationally.

HOW LONG DO WE KEEP YOUR INFORMATION?

In short: we keep your information for long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require keeping your personal information for longer than five years.

When we have no ongoing intimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible for example because your personal information is restored in backup archives, then will securely store your personal information and isolated from any further processing until deletion is possible.

DO WE KEEP YOUR INFORMATION SAFE?

In short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security any property collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

In short: We do collect data from children under 18 years of age. By using the services, you represent that you are at least 18 years old.

WHAT ARE YOUR PRIVACY RIGHTS?

In short: In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your subscription at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details for bit provided in the section '*How can you contact us about this notice*' below.

We will consider and act upon any requests in accordance with applicable data protection laws. If you are located in the EEA or UK and believe we are unlawfully processing your personal information, you also have the right to complain to your member state data protection authority or UK data protection authority.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be expressed and/or implied consent, depending on the applicable law, you have the right to withdraw

your consent at any time. You can withdraw your consent at any time by contacting us using the contact details provided at the intersection of how you can contact us about this notice below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, with it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Cookies and similar technologies: most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove and reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers, mobile operating systems, and mobile applications include a do not track data ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browse activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard online tracking is adopted that we must follow in the future, we will inform you about that in practice in a revised version of this privacy notice.

DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In short: yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civic Code Section 1798. 83, also known as the 'Shine The Light Law', permits our users who are California residents to request and obtain from us, once a year free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

DO WE MAKE UPDATES TO THIS NOTICE?

In short: yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy from time to time. The updated version will be indicated by an updated 'Revised' date, and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If your questions or comments about this notice, you may contact our Data Protection Officer (DPO) by e-mail at: info@assetreality.com or by post:

Data Protection Officer, Asset Reality Ltd, 90a High Street, Berkhamsted, Hertfordshire, HP4 2BL. United Kingdom.

HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to personal information we collect from you, change that information, or delete it. To request, to review, update, or delete your personal information, please email us at info@assetreality.com.