

Privacy Policy

1. Introduction

- 1.1. AIS Technology, through its brand name AIS Software, offers Software solutions to various businesses, enterprises and government entities. AIS Software develops custom software applications as well as on-premise, cloud-hosted and Software-as-a-Service (SaaS) applications. Spektrum is a SaaS workforce solution geared towards various offices and business across industries locally and abroad. Central to this mission is the company's commitment to be transparent with you about the personal data we collect and how it is used and shared throughout our solution.
- 1.2. This Privacy Policy describes how AIS Technology Ltd (AIS) collect, store and handle personal information of individuals in accordance with the Data Protection Act ("DPA") and the laws of Malta. Our processing and use of personal data is also designed to comply with the EU General Data Protection Regulation (GDPR). This Privacy Policy applies to the Spektrum SaaS application (<https://spektrum.aissoftware.com.mt>), any additional modules within Spektrum, any other on-premise solution offered by AIS, any other cloud-hosted custom application developed by AIS, communications and services, hereby referred to as the "Services", including visitors to all AIS branded websites.
- 1.3. Please read this Privacy Policy to understand how we use the personal information we may collect from you. If you use our Services, you consent to this Privacy Policy.

2. Consent

- 2.1. If you use our Services, you consent to the collection, use and sharing of your personal data under this Privacy Policy (which includes other documents referenced in this Privacy Policy) and agree to the Terms of Service Agreement. If you use our Services after an update to this Privacy Policy, you consent to the changed document.
- 2.2. We may modify this Privacy Policy from time to time. If we make material changes to it, we will provide notice through our Services, or by other means (e.g. electronic mail along with the updated Privacy Policy), to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account. Your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that you are consenting to the updated Privacy Policy.
- 2.3. In this Privacy Policy you will understand:
 - About Personal Information
 - Who Collects and Processes Data Collected
 - Information We Collect
 - How We Use Your Data
 - Data Disclosure
 - Data Security
 - Data Retention
 - International Transfer of Information Collected
 - Your Rights & Obligations
 - Protection of Minors
 - How to Contact Us

3. About Personal Information

- 3.1. Personal information refers to any information which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you. For the purposes of this Privacy Policy, personal information encompasses sensitive personal information which relates

to information relating to your health, political opinions, religious beliefs, etc. For the avoidance of doubt, please note that this Privacy Policy is applicable only if you are a natural person / an individual.

4. Who Collects and Processes Data Collected

- 4.1. AIS processes Personal Data both as a Controller and as a Processor, as defined in the GDPR.
- 4.2. AIS, for SaaS applications, will be the Controller for "Subscriber" data, meaning Personal Data of the individual that registers for our services and enters into the Terms of Service Agreement. In addition, AIS also controls Personal Data that we collect from our website and outside of our website through other channels. For instance, this includes when you contact us by telephone, email and chat services, respond to our marketing materials, submit physical forms etc.
- 4.3. For "User" data that is stored or processed in each Subscriber's Spektrum-SaaS application account, the respective Subscriber/Customer (potential) will be the Controller in accordance with GDPR, and AIS will be the Processor.
- 4.4. Throughout AIS's SaaS Services, each Subscriber has full control over the Personal Data that is stored within their account. This Personal Data can include information such as phone numbers and addresses. After Subscribers initiate the services, they may create Users ("User" data) with different privilege levels, including some granted with Administrator rights. At any time, the Subscriber and these Administrators can add to, modify, delete or share the User data. Because this data is user generated, it is the Subscriber's responsibility to ensure that collection and processing of data is done in accordance with applicable law.
- 4.5. AIS will not process Personal Data for other purposes or by other means than instructed by its Subscribers. Any User who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his/her query to AIS's Subscriber, the data controller.

5. Information We Collect

- 5.1. With the purpose of providing you with the ~~Spektrum web application &~~ Services and to operate in an efficient and effective manner by providing you with the best service possible, we need to collect relevant personal information from you. The personal information collected by us may include (but is not limited to) the following:
 - 5.1.1. Contact information such as your name, company name, address, phone number and e-mail address provided when you communicate with us. This include instances where you register to use our websites, applications or services (including free trials), respond to any marketing materials we send out or when you contact us for any enquiries, including communication by telephone, email, chat services and social media.
 - ~~5.1.2.~~ Information about your computer or device used to access our Services, and about your visits to and use of our websites (including your IP address, geographical location, operating system, browser type, number of visits, average time spent on the site and pages viewed). The collected information is used to provide an overview of how people are accessing and using the AIS website and not for any additional purpose, such as to profile users.
 - ~~5.1.3.~~5.1.2. We may do this using cookies, web Beacon or similar technologies. By continuing to visit the website, you agree to the placement of cookies on your device.
 - ~~5.1.4.~~5.1.3. Details of the emails and other electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication. We use this to help ensure our communications are useful for you.
 - ~~5.1.5.~~5.1.4. Personal data provided when you register for our publications such as newsletters, complete online forms (including call back requests), take part in surveys, post on our blogs, download information such as white papers or other publications or participate in any other interactive areas that appear on our website.

[5.1.6-5.1.5.](#) Personal data provided when you commence a business relationship with us such as being our service provider/business partner.

[5.1.7-5.1.6.](#) Personal data provided when you lodge a complaint with us.

[5.1.8-5.1.7.](#) Personal data provided when you provide feedback to us through websites or other channels.

[5.1.9-5.1.8.](#) Other than personal information obtained from you directly, we may also obtain your personal information from third parties we deal with or are connected with you (credit reference agencies or financial institutions), and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

6. How We Use Your Data

6.1. We may collect and use personal data from you or from the category of third parties identified in this Privacy Policy, for one or more of the following purposes:

6.1.1. To verify your identity

6.1.2. To assess and process your application(s) /request(s) for AIS Services

6.1.3. To administer and manage the Services we provide you, including charging, billing, facilitating payments and collecting debts

6.1.4. To assess and/or verify credit worthiness

6.1.5. To detect and prevent fraudulent activity

6.1.6. To keep in contact with you and provide you with any information you have requested

6.1.7. To engage in business transactions in respect of Services to be offered and provided to you

6.1.8. To establish and better manage any business relationship we may have with you

6.1.9. To process any communications you send us (for example, answering any queries and dealing with any complaints and feedbacks)

6.1.10. To notify you about benefits and changes to the features of the Services

6.1.11. To produce data, reports and statistics which shall be anonymised or aggregated in a manner that does not identify you as an individual

6.1.12. To investigate, respond to, or defend claims made against, or involving AIS Technology Ltd.

6.1.13. To conduct our internal marketing and promotional activities. For example, we may use it to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you. You can also unsubscribe from any email marketing using the links provided in the emails we send to you. Please refer to the section below on 'Your Rights' to object to processing for marketing purposes.

6.1.14. To maintain records required for security, claims or other legal purposes

6.1.15. To comply with legal and regulatory requirements

6.1.16. For internal purposes such as auditing, data analysis, and research to improve AIS Technology's products, services, and customer communications.

6.1.17. For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

7. Data Disclosure

7.1. As a part of providing you with the Services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

7.1.1. Law enforcement agencies

7.1.2. Government agencies

7.1.3. Companies and/or organisations that act as our agents, contractors, service providers (including their subcontractors) and/or professional advisers

7.1.4. Companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions and providing you with the Services that you have requested or subscribed for

- 7.1.5. Our business associates and other parties for purposes that are related to the purpose of collecting and using your personal information
- 7.1.6. Other parties in respect of whom you have given your express or implied consent
- 7.1.7. Subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to the Services.
- 7.2. Please note that AIS uses data processors that collect, store and process your data on behalf of AIS. The selected processors offer all the appropriate guarantees with regard to technical and organizational security measures regarding the processing of your personal data. They are used for the following purpose:
 - 7.2.1. Hosting of our applications or services
 - 7.2.2. Hosting of our customer relationship management system,
 - 7.2.3. Enabling payments,
 - 7.2.4. Enabling user support functionalities, such as website chat rooms,
 - 7.2.5. Enabling visit and usage analytics

8. Data Security

- 8.1. We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use SSL technology in most cases to encrypt data during transmission through public internet, to be only accessed by those authorized with special access rights to our systems.
- 8.2. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the “How to Contact Us” section.
- 8.3. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

9. Data Retention

- 9.1. We will retain personal data we process on behalf of our client for as long as needed to provide the Services. We will retain and use this personal information as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements.

10. International Transfer of Information Collected

- 10.1. Our company is based in Malta and we use IT and other service providers which are located in multiple countries. Our applications or services or parts of them may be hosted in facilities provided by Microsoft Azure in Western Europe. Meanwhile, our websites may be hosted in Europe and when you send an email to us, this will also be stored on email servers hosted by Microsoft in Europe. Therefore, your information collected by AIS may be stored and processed in Malta, Europe, or any other country in which AIS or its affiliates or service providers maintain facilities.
- 10.2. When submitting your personal data, you are agreeing to such processing, transfer or storage as outlined above. We will ensure at all times to take all reasonable steps necessary to maintain the security of your personal data in accordance with this Privacy Policy. We shall also take reasonable steps to ensure that any such third-party entities are contractually bound not to use your personal

information for any reason other than to provide AIS or Spektrum App, Website & Services that are contracted by us to provide and to adequately safeguard your personal information.

10.3. We take steps to ensure that where your information is transferred to our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations. In each case, such transfers are made in accordance with the requirements of Regulations (EU) 2016/679 (the General Data Protection Regulations or “GDPR”).

11. Your Rights

11.1. Right to Access, Correction, Deletion, Data Portability

11.1.1. We can assist you to access, correct or delete your personal information held by us. Where you wish to have access to your personal information in our possession, wish to amend or to delete your information, you may make a request to us by contacting AIS Team with the contact details provided below. You should quote your name, address and phone/account number and provide brief details of the information you want a copy of in any such request. We will use reasonable efforts to comply with your request to access, correct or delete your personal information within 30 days of receiving your request. We will fulfil your request by sending your copy electronically, unless the request expressly specifies a different method. Please note that we may have to withhold access to your personal information in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

11.2. Restriction of Processing, Object to Processing & Withdraw Consent

11.2.1. At any time, you may request to place restrictions on processing or object to the processing of your Personal Data, on legitimate grounds, except if it's otherwise permitted by applicable law. You may at the time of collection and at any later time, oppose the processing of your personal data for the purposes of marketing. Where the processing of your information is based on your consent, you have a right to withdraw that consent subject to legal or contractual restrictions.

11.2.2. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact us with the contact details provided below. You also have a right to lodge a complaint with data protection authorities.

11.2.3. This provision does not apply to Personal Data that is part of Customer's Data. In this case, the management of the Customer Data is subject to the Customer's own Privacy Policy, and any request for access, correction or deletion should be made directly to the Customer responsible for the uploading and storage of such data into the Service.

11.3. Incomplete Personal Information

11.3.1. Where indicated (for example in registration/application forms), it is obligatory to provide your personal information to us to enable us to process your application for the Services. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with the Services.

12. Your Obligations

12.1. You are responsible for providing accurate and complete information to us about yourself and any other person whose personal information you provide us and for updating this personal information as and when it becomes incorrect or out of date by contacting the AIS Team via the contact details provided below. This obligation is a condition to the provision of the Services to you and/or any

other person authorised or permitted by you or your organisation/company to use the Products and/or Services. In the event you may need to provide us with personal information relating to third parties (for example about your spouse or children or where you are the designated person in charge (from an organisation or company) for dealing with us, if you are acquiring and are responsible for a service and/or product that they will use), you confirm that you have (i) obtained their consent or otherwise entitled to provide their personal information to us and for us to use accordingly, and (ii) informed them to read this Privacy Policy at our website.

13. Protection of Minors

13.1. As a general rule, children and persons under the age of 18 years should not disclose personal data to us without the consent of their parents or guardians. We do not solicit personal data from children and we do not knowingly collect personal data from children, use said data in any way, or disclose said data to third parties without authorisation.

14. How to Contact Us

14.1. If you have requests and questions or concerns about this Privacy Policy, please contact us at:

AIS Technology Limited

BLB903, Bulebel Industrial Estate, Zejtun, ZTN3000, Malta

Tel: +356 21803350

Email: info@ais.com.mt