



CRYSTAL CLEAR SOFTWARE LTD.

ISO 9001:2008 Certified
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Personal Data Protection Policy

Controller of Personal Information

Any personal information processed by Crystal Clear Software Ltd in connection with this Privacy Policy is controlled by Crystal Clear Software Ltd, which is considered the “data controller” of your personal information under Regulation (EU) 2016/679 of The European Parliament. Our address is Data Protection Officer, Crystal Clear Software Ltd Plc, 3rd Floor, King Fahd Plaza, 52 Kampala Road, PO Box 7463, Kampala, Uganda.

If you have received a service from one of our partners for training, implementation or support regarding our products, then that other institution will separately be considered a “data controller” under European data protection law. Any other provider of services besides our partners – like e.g. www.drivehq.com – will also be considered separately a “data controller”. You are advised to access the privacy policies of such providers directly.

What do we mean by personal information?

Personal information means details which identifies you or could be used to identify you, such as your name and contact details, your support requests, your purchase history. This also includes personal data that you provide about your institution’s clients (e.g. you send us your database for correction). This may also include information about how you use our websites and mobile applications.

When does this Policy apply?

This Privacy Policy applies to personal information about you that Crystal Clear Software Ltd collects, uses and otherwise processes as a customer or potential customer, including when you use our websites, contact our partners and purchase our services through third parties.

Where we reference that others are data controllers in the section 'Controller of Personal Information', please do consult their privacy policies for further information.

Additional Terms and Conditions or policies may apply if you elect to take additional services from us.

How can you keep your personal information secure?

We take great care to protect the personal information you provide. We make sure our websites have SSL security certificates in place. We recommend you use only official communication channels like:

- Telephone
- Email
- Live Support (our chat facility)
- Drivehq.com (our FTP website)
- Teamviewer (for sharing screens)

If you use other media channels, your data might not be protected and using these channels is at the client's risk.

We advise you to:

- Always use anti-virus and anti-malware software.
- Always send databases in encrypted form to drivehq.com and send us the password in a separate mail.
- If you use Loan Performer, never share your log in details with anyone else.
- If you use the internet to access your database, always ensure that your access to the web is secure. Always logout properly to ensure that another person is unable to access your personal details. Delete your browser's history. This is especially important if you are using a publicly accessible computer.
- Be aware of and protect yourself against Internet fraud and 'phishing'
- When you are concerned about an email, we recommend that you don't click on any links, open any documents or reply to it until you have reconfirmed about its genuineness from your partner or Crystal Clear Software Ltd.
- If you deal with our partners to help you with Loan Performer, ask them about their own data protection policies.

When do we collect personal information about you?

Crystal Clear Software Ltd collects personal information about you whenever you use our services (whether these services are provided by us or by other companies or partners acting on our behalf), when you use our website or mobile applications or interact with us via email or our partners.

For additional details see 'What types of personal information do we collect and retain?' below.

In addition, we may receive personal information about you from third parties, including:

- Companies contracted by us to provide services to you.
- Companies or persons who shared information with Crystal Clear Software Ltd.

What types of personal information do we collect and retain?

When you use our services, you will need to provide Crystal Clear Software Ltd with your personal details or the details of those interested in our products and services.

We collect the following personal information:

1. Information that you provide to Crystal Clear Software Ltd to download or to buy or products and services. This includes:
 - Your name, address, email, contact details, function and your employer.
 - When you are buying for someone else, we need the same from the 3rd party.
 - Data about your company's operations in order to configure Loan Performer.
 - Data of your clients in case you want us to handle data conversion to Loan Performer.
2. Information that you provide during the use of our products and services:
 - When assisting you with installation and support, we may need to give us access to your server and computers.
 - For support purposes you may need to give us access to your database.
 - For support purposes you may need to provide us screen shots of bugs you encounter, client or loan numbers for us to reproduce a bug, reports that are supposedly (in-)correct.
3. Information that we collect about you indirectly, for example through third party public sources such as LinkedIn or the website of your company or the company that you work for. Also note that personal information that you provide on our Website may be combined with information collected off-line or from third parties.

What do we use your personal information for?

The main purposes for which we use your personal information are:

- To deliver the services you have asked for.
- To be able to follow up on download requests.
- To be able to contact you for support issues you have.
- To improve our products, e.g. a feature request that can be included in Loan Performer.
- To send status updates and service communications to you. Crystal Clear Software Ltd may for example send a communication informing you that on this day we have a public holiday and our office is closed.
- To carry out analysis and market research.
- To carry out marketing and keep you informed of Crystal Clear Software Ltd' products and services. Crystal Clear Software Ltd will analyse the way in which our sales channels, products and services are being used by customers so that we can understand how to improve the service we offer and encourage customers to use the full range of our products and services.

Information Security

Information security is paramount. We work hard to protect our client's and personnel's data we hold from unauthorized access to or unauthorized alteration, disclosure or destruction of information. All databases are encrypted and the company computer systems are robust and running on the latest technology. In case of a breach, we shall inform our clients immediately.

When will we send marketing communication?

When we collect information directly from you we may ask you if you do not want to receive in future our marketing communications. We will at all times respect your choice as to what communications you wish to receive and the methods by which these are sent.

How can you change what marketing communications you receive and how you receive them?

If you decide you would no longer want to be sent marketing communications, you can change your preference at any time. You remain at all times in control. You can stop being sent marketing communication by unsubscribing to our newsletter on our website.

However kindly note that if you tell us that you do not wish to be sent further marketing communications, you may still receive service communications (as described above) which are necessary. If you ask us to stop sending marketing communications, please note we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications.

What is our legal basis for using your personal information?

Crystal Clear Software Ltd will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons Crystal Clear Software Ltd collected and needs to use your information. Under EU data protection laws in almost all cases the legal basis will be:

- The need to use your information to be able to deliver our products and services and/or perform the contracts we have with you.
- Crystal Clear Software Ltd' legitimate interests as a software provider to use your personal information to operate and improve our business as a software provider.
- Crystal Clear Software Ltd may need to use your personal information to comply with a legal obligation.
- Protection of the vital interests of you or another person.
- Your consent to Crystal Clear Software Ltd to use your information for a particular purpose.

However, where the processing of your data is subject to any other laws then the basis of processing your data may be different to such basis as set out above and may in those circumstances be based on your consent in all cases.

How long do we keep personal information? The right to be forgotten.

Crystal Clear Software Ltd will keep your information for as long as we need it for the purpose it is being processed for. For example, if you have bought a license for Loan Performer, we should be able to support you and even if you are no longer our client, we will keep the information for a period that would enable us to handle or respond to any complaints, queries or concerns relating to Loan Performer. Such information may also be retained for Crystal Clear Software Ltd to continue to improve your experience with us. We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is business or customer need for it.

Performance of a contract with you

It will be necessary for Crystal Clear Software Ltd to use your personal information in order to serve you.

Legitimate Interests

As software service provider Crystal Clear Software Ltd has a legitimate business interest to use the personal information we collect to offer an effective service and carry out our business.

Compliance with legal obligations

There may be situations where Crystal Clear Software Ltd may be subject to a legal obligation and needs to use your personal information to comply with those obligations. This maybe for example where fraud has taken place.

Consent

Alternatively, we may collect and use your personal information where you have given your express specific consent to Crystal Clear Software Ltd may for example where you have subscribed to our newsletter.

Where the basis of our processing your data is consent, you can withdraw your consent to such processing at any time, including by amending your profile online.

Who do we share your personal information with?

Your personal information processed by Crystal Clear Software Ltd may be shared with the companies/partners we operate with. For more details about such companies/partners please visit our website. However, we shall only share information with them, so they can assist us in providing services to you and to understand more about your business.

Crystal Clear Software Ltd will not pass on your private data to third parties apart from our business partners, unless it has to comply with requests from the legal authorities.

What data do you hold about me which may be accessed?

Crystal Clear Software Ltd holds data about you which is required for the purpose of conducting business with you. This includes general contact information and information regarding your clients that you have specified.

Requesting a copy of your personal information

Under the EU Data Protection Regulation (GDPR), you may request a copy of any personal data about you held by Crystal Clear Software Ltd. There is no fee for this request.

The request must be in writing and must contain your name and contact details and the details of your request.

You must also provide: a photocopy of your passport or driving licence, so that we can verify your identity and your signature and the date of the request. If you are applying on behalf of another person then signed authority from the individual is required.

Please send your request to ccs@infocom.co.ug. Your request will be handled by the respective team leader of your geographic area. You will receive a reply within 2 days.

Right to Rectification

Our clients – staff included – have the right to have inaccurate personal data corrected. You may review, update, correct or delete the personal information CCS has stored by contacting us at ccs@infocom.co.ug. Your request will be handled by the respective team leader of your geographic area. You will receive a reply within 2 days.

While you are under no obligation to provide information, we cannot guarantee that we can provide you with our services if you do not provide certain information. For example, we may be unable to provide customer support in the event that relevant information related to the use of our products or services is withheld.

Protecting Children's Privacy

We do not knowingly collect, use or share information that could reasonably be used to identify children under age 13 without prior parental consent or consistent with applicable law.

Acceptance of this Policy

You should read this Policy carefully to ensure that you are happy with its contents. If you do not agree with this Policy, you should refrain from using our Website and our products. Continued use of our Website and products after having been informed of this Policy implies acceptance of the information contained in this Policy.

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