Privacy statement and cookies

Please read this privacy statement ("Privacy Statement") carefully, as it describes our practices for collecting, using, disclosing, retaining and protecting your personal information. This Privacy Statement applies to any website, application or service that references this statement. When you provide us with or we collect personal data in any of the ways described in clause 2 below, you consent to our collection, storage and use of that data: (a) in order to carry out our contractual obligations to you; (b) because of our legitimate interest in processing it (i.e. for the purposes of internal administration, data analysis and benchmarking - see clause 3 for more information, direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) with your consent, which you may withdraw at any time, as described in this Privacy Statement.

This privacy statement may be useful to you even if you are not a customer or direct contact of ours and have not used our websites, apps or services. We may hold your personal data because we have received it from a user of one of our websites, apps or services.

Brexit: References in this Privacy Statement to the 'GDPR' shall include any 'UK GDPR' that may be established under the UK Data Protection Act 2018 in the event of the United Kingdom's withdrawal from the European Union.

1. Our company

This Privacy Statement applies to all products, applications and services offered by The Sage Group plc (a company incorporated in England with company registration number 02231246 and registered office at C23 5 & 6 Cobalt Park Way, Cobalt Business Park, Newcastle-Upon-Tyne, Tyne & Wear, NE28 9EJ) and its subsidiaries, but excludes products and applications or services that contain separate privacy statements not incorporated herein.

2. Information gathering

To the extent permissible under applicable law, we collect data about you and any other party whose data you provide to us at the time you provide it to us:

- you register to use our websites, applications or services (including free trials);
 this may include your name (including your business name), address, email
 address and telephone number. We may also ask you for additional information
 about your professional activity and preferences;
- you place an order through our websites, applications or services; this may include your name (including your business name), address, contact details (such as your telephone number and email address) and payment details;

- use our applications, which could include the collection of metadata;
- Fill out online forms (including call-back requests), participate in surveys, post on our message boards, post a blog, enter a contest or sweepstakes, download information such as white papers and other publications, or participate in any other interactive areas on our website or within our application or service;
- interact with us through social media;
- you tell us your contact details when you register to use or access any websites, applications or services we make available or when you update those details; and
- contact us through offline channels, such as telephone, fax, SMS, email or regular mail.

We also collect data from you when you only partially complete and/or abandon the input of information on our website and/or other online forms, and we may use such data to contact you to remind you to complete the outstanding data and/or for marketing purposes.

We also collect data from your devices (including mobile devices) and applications that you or your users use to access and make use of any of our websites, applications or services (for example, we may collect device ID number and type, location data and connection information such as statistics about your page views, traffic to and from websites, pre-linked URLs, advertising data, your IP address, your browsing history and your website access data). We may use cookies or similar technologies for this purpose (as described in clause 11 below).

We may supplement the personal data we collect from you with information we obtain from third parties who are permitted to share it, for example, information from credit bureaus, search information providers or public sources (e.g., for customer due diligence purposes), but in each case as permitted by applicable law.

Transfer of data from third parties

If you provide us with personal data about another person, you are responsible for ensuring that you comply with any obligations and consent obligations under applicable data protection laws in relation to such disclosure. To the extent required by applicable data protection law, you must ensure that you have properly informed the other person, that you have their explicit consent or have a lawful basis for disclosing their information to us and that you have explained to them how we collect, use, disclose and retain their personal data or have them read our Privacy Statement.

3. Use of your data

To the extent permissible under applicable law, we use your data to:

- provide information and services that you have requested or applications or services that you have requested;
- compare information for accuracy and check with third parties;
- to provide, maintain, protect and improve applications, products, services and information that you have requested from us;
- manage and administer your use of applications, products and services that you have requested us to provide;
- manage our relationship with you (e.g. customer services and support activities);
- evaluate, measure, improve and protect our content, website, applications and services, and provide you with an enhanced and personal user experience;
- to carry out internal testing of our website, applications, systems and services to
 test and improve their security, provisioning and performance, in which case we
 will pseudonymise any information used for such purposes and ensure that it is
 only displayed at aggregated levels that cannot be linked to you or any other
 individual natural person;
- provide you with information that we are required to send you in order to comply with our regulatory or legal obligations;
- comply with any other of our legal or regulatory obligations;
- to detect, prevent, investigate or remedy crime, illegal or prohibited activities or generally to protect our legal rights (including for this purpose communications with regulators and law enforcement agencies);
- contact you to see if you would like to participate in our customer research (e.g. your feedback on your use of our applications, products and services);
- evaluate, carry out statistical analysis and benchmarking, provided that, in such circumstances, this is done in an aggregated form that cannot be linked to you or any other natural person individually, except as permitted by law;
- provide you with targeted advertising, information or marketing (which may include in-product messaging), which may be useful to you, based on your use of our applications and services;
- offer content and services jointly with third parties with whom you have a separate relationship (e.g. social media providers); and
- offer you location-based services (for example, advertising and other personalised content) where we collect geolocation data.

To the extent permitted by applicable law, we will retain data about you after your Sage account is closed, in the event that your application for a Sage account is denied or if you choose not to proceed. This data will be retained and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- to check against our records specific data from your device or systems directly relevant to your use of the websites, applications or services, to ensure that the websites, applications or services are used in accordance with our end-user agreements, and to resolve problems;
- obtain information regarding any technical errors and other problems with our website, applications and services;
- comply with our legal or regulatory obligations;
- collect data on how you and users use the functions of our website features, applications and services; and
- collect statistical data about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (if applicable). In addition to the purposes set out in this clause 3, we may also use the information we collect to provide you with targeted advertising, information or marketing (such as in-product messaging) that may be useful to you, based on your use of the website, applications or services or other information we have about you (depending on the websites, applications or services, you may be able to configure these features to suit your preferences). Clauses 5 and 6 of this Privacy Statement provide more detail on how we will do this.

We may evaluate and record our communications with you, including emails and telephone conversations. The information we collect may then be used for training purposes, quality control, to record information about our website, the applications and services you have requested or consulted us about, and generally to comply with our legal and regulatory obligations.

Mobile data

We may obtain information through mobile applications that you or your users install on your mobile devices to access and use our websites, applications or services or that you or your users use to provide other services related to that mobile application (for example, to synchronise data from our application or service with that mobile application). These mobile applications may be our own mobile

applications or may belong to third parties. If the mobile application belongs to a third party, you should read that third party's privacy statement, as it will apply to your use of that third party's mobile application. We are not responsible for such third parties' mobile applications or their use of your personal data.

Mobile applications may provide us with data relating to a user's use of that mobile application and the use of our applications and services accessed through that mobile application. We may use such information to provide and improve the mobile application or our own application or services. For example, activity within a mobile application may be recorded.

You can configure the privacy settings of our mobile application on your device, but this may affect the performance of the mobile application and the way you interact with our applications and services.

Data analysis and benchmarking

We may use the information that is generated and stored while you use our services in our legitimate business interests for the purpose of providing you with the best services and solutions and an optimised experience. These purposes include the following:

- provide you with advertising, information or marketing (such as in-product messages), which may be useful to you, based on your use of our services;
- conduct research and development to improve our products, services and applications;
- offer new and develop existing functionalities and services (including statistical analysis, benchmarking, outlook and receipt recognition and cash flow forecasting services); and
- location-based services (e.g., relevant content based on your location), for which we collect geolocation data to provide you with a personalised experience.

Please note that our use may include personal data of your individual customers, suppliers, employees and others whose information you provide on any of our websites, applications or services.

Any individual whose personal data we process has the right to object to such processing on the basis of our legitimate interests and, if you wish to do so, simply contact us at globalprivacy@sage.com.

4. You have the right to object to the processing of your data based on our legitimate interests.

If you wish to exercise this right, please contact us at privacyiberia@sage.com. Please note that this may affect our ability to provide you with certain useful services and solutions.

We may share your data with:

- any company within the Sage Group for the purposes set out by the Sage Group, (e.g. global information and customer relationship management; software and service support and enhancement; and to provide you with information, applications, products or services that you have requested);
- our service providers and agents (including their sub-contractors) or third
 parties who process data on our behalf (e.g. internet service and platform
 providers, payment processing providers and the organisations we engage to
 help us send communications to you) so that they can help us provide you with
 the applications, products, services and information that you have requested or
 that we believe may be of interest to you. We have contracts with them that
 prevent them from using your personal data unless we tell them to. They will keep
 your data securely and will retain it only for the period of time we specify;
- It is possible that other entities may also be responsible for processing the data we share with them, for example, academic or research organisations with whom we may collaborate to conduct studies in the public interest or necessary for our or other organisations' legitimate interests, for example, to provide valuable information to our customers or to improve the services we offer. In such circumstances, before we share this information, we will take additional steps to protect your personal data (for example, by pseudonymisation, anonymisation or aggregation) in order to protect your privacy and the confidentiality of your data;
- partners, including system implementers, distributors, value-added resellers, independent software vendors and developers who assist us in providing you with applications, products, services and information that you have requested or that we believe may be of interest to you;
- third parties used to facilitate payment transactions, such as clearing houses and clearing systems, financial institutions and payees of transactions;
- third parties with whom you have a relationship and to whom you have allowed us to send information (for example, social networking websites and other third party service providers);
- third parties for marketing purposes (e.g. our partners and other third parties
 with whom we cooperate and whose products and services we believe are of
 interest to you in the course of your business activities. For example, financial
 services organisations (such as banks, insurers, finance providers), payment
 solution providers, software and service providers offering business solutions);

- credit reference and fraud prevention agencies;
- government entities, legislators and other third parties necessary to comply with the Sage Group's legal and regulatory obligations;
- law enforcement to enable them to detect or prevent crimes or prosecute offenders;
- any third party in the context of possible or actual legal proceedings, provided that we are acting lawfully in this regard (e.g. in response to a court order);
- any third party, in order to comply with our legal and regulatory obligations, including due or regulatory communications or the detection or prevention of illegal acts;
- our own professional advisers and auditors, or those of the Sage Group, for the purpose of providing professional advice or fulfilling our audit responsibilities;
- another organisation in the event that we sell or buy (or negotiate the sale or purchase of) any business or assets;
- another organisation to which we may transfer our agreement with you; and
- state departments where communication is mandatory under the applicable legislation.

We may share non-personally identifiable data about your use of our website, applications, products or services publicly or with third parties, but this does not include data that can be used to identify you.

We are required by law to provide metadata to HM Revenue & Customs (HMRC) when you use a Making Tax Digital compatible software package or application to help you complete and submit tax updates or returns. For more information about the data we send to HMRC, <u>click here</u>. To view HMRC's transaction monitoring privacy notice, <u>click here</u>.

5. Marketing

From time to time, we may use your information to contact you with information about our applications, products and services which we think may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) may contact you with information about their products or services which we think may be of interest to you. Either we or they may contact you for this purpose by telephone, post, SMS or email. You have the right to stop us from contacting you for marketing purposes at any time. You may also request at any time that we do not share your data with third parties of the type referred to in this paragraph. If you wish to exercise such rights, you can select your contact preferences at the time you provide us with your information on our websites,

our applications or services, through the preference centres to which we give you access, or by emailing us at privacyiberia@sage.com. You can also unsubscribe from email marketing by using the links in the emails we send you.

Third-party platform advertising

We may share your data with third party platform providers (such as LinkedIn, Instagram, Facebook, Google and Twitter) when you respond to communications we post on those third party platforms to provide you with targeted advertising/content through the relevant third party platform and based on your profile or interests. The third party platform provider will use your information to identify your account and provide you with advertising. You can control which advertisements you receive through the privacy settings of the respective platform provider. For more information about this, you should contact the third party's helpdesk/helpdesk.

6. Your data and your rights

If you are resident in the EEA or another jurisdiction with similar data protection laws, you have the following rights in certain circumstances:

- the right to be informed about how we use your data and to obtain access to it;
- the right to have your information rectified or erased or to impose restrictions on the processing of your information;
- the right to object to the processing of your data, for example for direct marketing purposes or where it is carried out in our legitimate interests;
- the right to have the data that you have provided to us automatically and that we have returned to you in a structured, commonly used and electronically readable format, or to have it sent directly to another company, if technically possible ("data portability");
- where the processing of your data is dependent on your consent, the right to withdraw such consent subject to legal or contractual restrictions;
- the right to object to decisions based on the automatic processing of their personal data, such as profiling; and
- the right to lodge a complaint with the supervisory authority responsible for data protection (e.g. in Spain, Agencia Española de Protección de Datos (AEPD)).

If we hold any information about you that is incorrect or if there are any changes to your details, please let us know so that we can keep our records up to date and accurate.

If you withdraw your consent to the use of your personal data for the purposes set out in our Privacy Statement, we may not be able to provide you with access to all or certain parts of our website, applications and services.

We will retain your personal data during our business relationship and thereafter for as long as is necessary and relevant for our legitimate business purposes, in accordance with the Sage Group Data Retention, Marking and Destruction Policy or as otherwise permitted by applicable laws and regulations. When we no longer need your personal data, we will securely delete it (without further notice to you).

7. Changes to this Privacy Statement

We may change this Privacy Statement from time to time. However, we will not diminish your rights under this Privacy Statement. We will always update this Privacy Statement on our website, so we suggest that you try to read it when you visit the website (the "last updated" indication shows you when this Privacy Statement was last updated).

8. Data security and storage

We will keep your data secure by taking appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage. We will do our best to protect your personal data, but we cannot guarantee the security of data transmitted via the internet or similar connection to our website, our applications or services or to another website, application or service. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services, please keep this password secure; we will not disclose this password to anyone.

If you believe your account is at risk, you can contact us at privacyiberia@sage.com.

9. Transfers outside the European Economic Area and the United Kingdom

Personal data within the European Union and the United Kingdom are protected by data protection legislation, but other countries do not necessarily protect your personal data in the same way.

Our website and some of our applications or services or parts of them may be hosted in the United States or elsewhere outside the United Kingdom or the EEA (which includes all EU countries plus Norway, Iceland and Liechtenstein) ("the EEA as a whole"). This means that we may transfer data transmitted to us via the Website or the App or a service to a location outside the EEA, in the United States or other territories outside the EEA. When you send an email to us, will also be stored on our email servers, which are hosted in the United States.

We may use service providers located outside the EEA to help us provide our website, apps and services to you (for example, platform and payment providers who help us

provide our apps and services, or advertising or to process your payments). This means that we may transfer your data to service providers outside the EEA for the purposes of providing you with our apps, advertising and services.

We take a number of steps to ensure that when our service providers and hosting providers transfer your data to a location outside the EEA, appropriate data protection measures and controls are in place in accordance with applicable data protection laws and regulations. For example, we may share data with our group companies or affiliates located outside the EEA for the purposes covered by this Privacy Statement. All Sage Group companies are subject to Sage group data protection policies designed to protect data in accordance with applicable EU data protection laws. In each case, such transfers are made in accordance with the requirements of Regulation (EU) 2016/679 (the General Data Protection Regulation or "GDPR") and may be based on the use of the European Commission's Model Clauses for transfers of personal data outside the EEA.

By using our website, products or services or interacting with us in the manner described in this Privacy Statement, you consent to the transfer of your data outside the EEA in the circumstances set out in this Privacy Statement. If you do not want your data to be transferred outside the EEA you should not use our website, apps or services.

Our websites, applications or services may allow you to share data with social networking websites or to use those social networking websites to create your account or connect to your social networking account. These social networking websites may automatically provide us with access to certain personal data that they have retained about you (for example, content that you have viewed). You should be able to manage your privacy settings from within your account on the third party social network in order to manage what personal data you allow us to access from that account.

10. Other websites and social networks

If you click on a link from our website, application or service to another website or service, this Privacy Statement will no longer apply. We are not responsible for the data handling practices of third party websites or services and encourage you to read the privacy statements posted on such websites or services.

Our websites, applications or services may allow you to share data with social networking websites or use such social networking websites to create your account or connect to your social networking account. These social networking websites may automatically provide us with access to certain personal data that they have retained about you (for example, content that you have viewed). You should be able to manage your privacy settings from within your account on the third party social network in order to manage what personal data you allow us to access from that account.

11. Cookies, analytics and traffic data

Cookies are small text files that are transferred from our websites, applications, or services and stored on your device. We use cookies to help provide you with a personalized service and to improve our websites, applications, and services for your benefit.

Our cookies may be either session cookies (temporary cookies that identify and track users within our websites, applications, or services and are deleted when you close your browser or end your session) or persistent cookies (cookies that enable our websites, applications, or services to "remember" who you are and your preferences, and which remain on your computer or device after you close your browser or end your session).

We use the following types of cookies:

• Strictly Necessary Cookies

These cookies are essential for the proper functioning of our websites, applications, or services. For example, they allow you to access secure areas of our website or remember items you have placed in your shopping cart.

• Performance and Analytics Cookies

These cookies collect information about how visitors and users interact with our websites, applications, and services—for example, which features are used most often and whether users receive error messages from certain pages. These cookies do not collect information that identifies a visitor or user. All data collected is aggregated and therefore anonymous. We use these cookies solely to improve the performance of our websites, applications, and services.

Functionality Cookies

These cookies allow our websites, applications, and services to remember choices you make (such as your username, language, or region) and provide enhanced, more personalized features. They may also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages. These cookies may be anonymized and cannot track your browsing activity on other websites.

Targeting or Advertising Cookies

These cookies are used to deliver advertisements more relevant to you and your interests. They may also be used to limit the number of times you see an advertisement and help measure the effectiveness of advertising campaigns. These cookies are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and share this information with other organizations, such as advertisers. Often, targeting or

advertising cookies will be linked to site functionality provided by the other organization.

Web Beacons, Tags, and Tracking Parameters

We also use cookies and similar software known as web beacons or pixels to count users who have visited our website after clicking on one of our ads on another website or in emails, and to collect details of products and services purchased. These web beacons collect limited information that may sometimes identify specific users. It is not possible to refuse the use of web beacons. However, because they work in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

IP Address and Traffic Data

We keep a record of traffic data, which is automatically logged by our servers, including your Internet Protocol (IP) address, device information, the website you visited before ours, and the website you visit after leaving ours. We also collect certain statistics about our websites, applications, and services, such as access rates, page clicks, and page views. These traffic data or website statistics do not identify any individual.

Cookie Description and List

A cookie is a small piece of data (text file) that a website attempts to place in your browser and store on your device when you visit the site. Its purpose is to remember information about you, such as language preferences or login details. These are known as first-party cookies. We also use third-party cookies (cookies from a domain different from the website you are visiting) for marketing and advertising purposes. Specifically, we use cookies and other tracking technologies for the following purposes:

Strictly Necessary Cookies

These are essential for the proper functioning of our website. For example, they allow you to access secure areas or remember items saved in your shopping cart. You can disable these cookies by changing your browser settings, but doing so may affect the functionality of our website and your browsing experience.

Cookie subgroup	Cookies	Used cookies
www.sage.com	cf bm, AWSALB, cfruid, AWSALBCORS, SC ANALYTICS GLOBAL COOKIE, shell#lang, consented, ASP.NET SessionId, RequestVerificationTo ken	First party
sage.com	utag main st 1731603440207%3Bexp- session, utag main st utag main ses id, utag mai n pn, utag main st 1739241264135%3Bexp- session, utag main se, OptanonAlertBoxClo sed, utag main st 1741828374365%3Bexp- session, ELOQUA, utag main st 1731603449 079%3Bexp-session, utag main, LPVID, utag main st 1733966402535%3Bexp- session, utag main v id, CONSENTMGR, OptanonCon sent, utag main sn, utag main ss, utag main st XXXXX	First party
sagecity.com	cf_bm	Third party
va.v.liveperson.net	LPVisitorID	Third party
communityhub.sag e.com	cf_bm, OptanonConsent	Third party
radar.cloudflare.co m	cf_bm	Third party

Performance Cookies

Performance cookies allow us to monitor and analyze the usage and performance of our website. The data we collect tells us how many users visit the site, which pages are the most popular, and how visitors navigate through the site. We use this information to improve our website and to gather insights and statistics for marketing purposes. For more information, please refer to Sage's Privacy Statement.

Cookie subgroup	Cookies	Used cookies
sage.com	_ga,_gcl au,_ga xxxxxxxxxx,OTVariant, utag main v id XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	First party
www.sage.com	<pre>optimizelyDomainTestCookie,lux uid, an uid</pre>	First party
csxd.contentsquare.net	_cs_id3608, _cs_s3608, _cs_cvars3608	Third party
skyword.com	vis	Third party

Functional Cookies

Functional cookies enable us to provide enhanced features and personalized elements on our website—for example, recognizing a user when they return to the site and remembering their preferences (such as username, language, or region). They may also be used to remember changes made to text size, fonts, and other customizable parts of the website. These cookies are also used to deliver services you have requested. If you choose to disable them, some website functionality may be affected.

Cookie subgroup	Cookies	Used cookies
www.sage.com	<u>gd visitor, gd session, Sage-Stack-</u> <u>Target</u>	First party
sage.com	LPSID- nnnnnnn, optimizelyEndUserId, optimizelyDomainTestCookie	First party
<u>c.la1-c1cs-</u> <u>fra.salesforceliveagent.com</u>	X-Salesforce-CHAT	Third party
rum.optimizely.com	AWSELB, optimizelyRumLB, AWSELBCORS	Third party
<u>lpcdn.lpsnmedia.net</u>	lpTestCookie	Third party
va.v.liveperson.net	LPSessionID	Third party
<u>buzzsprout.com</u>	_buzzsprout_session	Third party
communityhub.sage.com	.te.w, .te.dpr	Third party
<u>vimeo.com</u>	cf_bm, vuid, _cfuvid	Third party

Targeting Cookies

We use these cookies to display advertisements and other content that may be of interest to you. They allow us to track how you use our website. We may use this data to suggest products and services that might be relevant to you. Our website does not

display third-party advertisements. For more information, please refer to Sage's Privacy Statement.

Cookie subgroup	Cookies	Used cookies
www.sage.com	<u>optimizelyOptOut</u>	First party
sage.com	cs id, cs nnnnnnnnnnn, qca, fbp, cs s, cs c, utag main ss 1%3Bexp- session undefined, utag main se 1%3Bexp- session undefined, utag main sn 1 undefined, cs cvars, utag main pn 1%3Bexp- session undefined	First party
t.contentsquare.net	_cs_same_site	Third party
doubleclick.net	test_cookie, ar_debug, receive-cookie- deprecation, IDE	Third party
<u>linkedin.com</u>	bcookie, lidc, li_gc	Third party
adnxs.com	receive-cookie-deprecation, anj, uuid2, XANDR_PANID	Third party
www.slideshare.net	split	Third party
<u>twitter.com</u>	cf_bm	Third party
webchathub.sage.com	AWSELB, AWSELBCORS	Third party
youtube.com	VISITOR_PRIVACY_METADATA, YSC, VISITOR_INFO1_LIVE,Secure-xxxxxxx	Third party
<u>slideshare.net</u>	browser_id	Third party
<u>quantserve.com</u>	mc	Third party
tracking.skyword.com	JSESSIONID	Third party
zoominfo.com	cf_bm, _cfuvid	Third party
j.6sc.co	_an_uid, _gd_visitor, _gd_session	Third party
taboola.com	receive-cookie-deprecation, t_gid, t_pt_gid, taboola_session_id	Third party

Disabling Cookies

You can configure your browser or your website, application, or service settings to restrict or completely block cookies if you wish. However, disabling cookies may affect your ability to use certain parts of our website, applications, or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete, or reject cookies, please visit www.allaboutcookies.org.

12. Further information

If you have any questions about how we handle your data, the contents of this Privacy Statement, your rights under local law, how we update your records or how to obtain a copy of the data we hold about you, you can write to our Data Protection Officer at

The Sage Group plc, North Park, Newcastle upon Tyne, NE13 9AA or email privacyiberia@sage.com.