

## **Policy Overview**

This “Privacy Policy” describes how and when Visual Bill, Inc. and its subsidiaries and affiliates (“Visual Bill”) collects, uses, shares and protects personal information of Visual Bill’s clients, prospects, partners, consultants and website visitors.

For purposes of this Privacy Policy, the term “personal information,” as identified below, refers to information that identifies an individual or relates to an identifiable individual. The types of personal information collected and used by Visual Bill are identified below. Non-personal information is information that does not permit direct association with an individual. Visual Bill may collect, use, transfer and disclose non-personal information for any purpose.

## **Collection and Use of Information**

### **Clients, Prospects and Partners**

Visual Bill collects personal information from our clients, prospects and partners. The information may be collected by members of our marketing, sales, operations, professional services, client support and administrative teams. The type of information collected includes, but is not limited to: contact information (name, address, telephone numbers, e-mail address, company, etc.), user preferences, and event and conference participation information. Visual Bill uses the personal information it collects to respond to requests for information about our company, products and services, to manage your participation in our events, conferences, surveys and other promotions and to enable you to communication with Visual Bill through its blogs, online forums, social media pages and other interactive media.

### **Client Employees**

In order to deliver Visual Bill’s services, we receive employee information from our clients that may contain one or more of the following data elements which are considered personal information: employee Id, name, title, location, corporate e-mail address, department/cost center, phone numbers, and corporate address.

We also receive billing and usage information of the assets we manage for our clients such as mobile devices, fixed lines or software subscriptions directly from the service providers or via our clients.

This data is only used for the delivery of Visual Bill’s service to the client, which include the following processing;

- Create secure online databases to enable central asset and cost management & data visibility
- Align users to the corporate services they are granted access to on the central database
- Ensure vendor billing accuracy and compliance with their service contract terms
- Identify and effect cost savings and avoidance initiatives
- Ensure database is kept up to date, including access management
- Benchmarking and supplier negotiations
- Generate non personal, aggregate statistical and financial information at a client level

Further, upon explicit opt-in and only with the consent of the particular client employee, Visual Bill may accept employee shipping address, credit card, and date of birth data. This information is stored for the sole purpose of requesting, approving, ordering, testing, and shipping wireless

devices (I.e.: cellular telephone, pagers, calling cards, personal digital assistants, etc.), accessories and service to the client employee upon approval from the employee's designated manager(s). This information is forwarded to the telecommunication carrier, designated carrier representative or accessory vendor selected by the employee for purposes of procurement, fulfillment and provisioning of the requested device, service, and/or accessory. Upon being notified by the telecommunications carrier or accessory vendor the order has completed, this information is purged from Visual Bill's records.

### **Web Visitors**

Visual Bill collects personal information about a visitor to our website only when the visitor chooses to provide such data. On certain pages, for example, a visitor has the opportunity to provide his/her personal information such as name, company, address, phone number, and email address. By supplying such information to Visual Bill, a visitor can request details about Visual Bill's products and services.

Visual Bill uses the personal information it collects to respond to requests for information about our company, products and services, register your company on our sites and identify you as a registered user, and to analyze trends and statistics regarding visitors' use of our sites.

We may use Personal Information to operate this Site, to communicate with the users or to compile general demographic and business statistics. This information is also collected to aggregate statistical information, facilitate system administration, and improve the contents of the Site. We may also use information collected to notify Users of changes to the Site, and for any other legitimate and lawful business purposes.

### **Website/Cookies**

Parties visiting Visual Bill websites can visit sites without providing personal information; however, computers connected to the internet contain information such as IP address (Internet Protocol Address) and domain name which may identify the computer and network attempting to access our website(s). This information may be captured and stored for tracking and reporting purposes.

"Cookies" are pieces of information that a website transfers to an individual's hard drive for record-keeping purposes. Cookies allow the website to remember important information about a Visual Bill website visitor. Like many websites, Visual Bill uses cookies to improve the visitor's on-line experience and to allow Visual Bill to better provide support to its website visitors. For example, using cookies we track the total number of visitors to our site(s) on an anonymous aggregate basis. We may also employ cookies so that we remember you when you return to the site(s), to keep track of the items you have requested from Visual Bill and to help us customize your web experience on return visits to the Visual Bill website(s). Visual Bill also keeps track of the pages you visit from our website and the content you access. We may associate personal information with a cookie file in those instances.

Some Visual Bill websites use Google Analytics to help analyze how users use the site. The tool uses "cookies" which are text files placed on your computer, to collect standard Internet log

information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity for Visual Bill's websites.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source, unless you explicitly submit that information via a fill-in form on our website.

### **Disclosure of Information**

Visual Bill may contract with third-party vendors and suppliers to perform certain functions on Visual Bill's behalf or to enhance Visual Bill's existing product and service offerings. These third parties will have access to personal information only to the extent necessary to permit them to do their jobs. Visual Bill will use reasonable efforts to obtain assurances from such third parties that they will safeguard personal information consistent with this Privacy Policy. Where Visual Bill has knowledge that a third party is using or disclosing personal information in a manner contrary to this Privacy Policy, Visual Bill will take reasonable steps to prevent or stop the use or disclosure.

Visual Bill and its third-party vendors and suppliers may disclose or otherwise use personal information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or government request, (b) enforce the applicable contract between you and Visual Bill, including investigations of potential violations thereof, (c) detect, prevent or otherwise address illegal or suspected illegal activities, security or technical issues, or (d) protect against harm to the rights, property or safety of Visual Bill, its employees and customers or the public as required or permitted by law.

Visual Bill may disclose personal information in connection with any reorganization, restructuring, merger or sale, or other transfer of assets, Visual Bill reserves the right to transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with this Privacy Policy.

### **Access & Amendments**

Maintaining an accurate database for our clients, using the data provided by the client, is a fundamental part of Visual Bill's routine service. Processes are established bespoke to each client's needs and service during the implementation which ensure that Visual Bill takes reasonable steps to aid users to correct, amend or delete personal information that is demonstrated to be inaccurate or incomplete.

Visual Bill wants to make it easy for individuals to communicate update requests for changes to be made to their information and our staff are trained and familiar with their role in achieving this.

### **Subject Access Requests (SAR)**

Visual Bill's online services are specifically created to allow both individuals and their employees' clear access to, and visibility of, all the billing data that is being generated against the assets they are using or providing.

Where a client has taken a service that allows end user access to their billing this allows individuals real time, unlimited access to their own data which is being held by Visual Bill.

### **Security**

Visual Bill employs reasonable and generally accepted measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration or destruction, whether in transmission or storage. Visual Bill conducts periodic internal and external audits to ensure that personal information is maintained in a manner consistent with this Privacy Policy. Any employee, vendor, or supplier found to have violated this Privacy Policy will be disciplined, up to and including termination of employment or termination of service contract. Visual Bill will further correct any deficiencies identified by internal and external audits to ensure continued compliance with this Privacy Policy. Please keep in mind that no security system can be guaranteed to be 100% secure. If you have any questions about the security of personal information, you can contact us via the "Contact Us" section of this Privacy Policy.

### **Data Retention.**

Visual Bill will use the client's data only as long as is necessary to implement, administer and manage the client's subscription in the Visual Bill service or as required to comply with legal or regulatory obligations, including under tax and security laws. When the client, terminates the Visual Bill Service, Visual Bill will remove all of the client's personal data from its systems within 90 days of service termination.

### **Contact Us**

Visual Bill strongly encourages any complaints with regard to this Policy or Visual Bill's implementation of this policy be raised with Visual Bill first using the contact information set forth below.

For suspected violations please include a description of the violation, date or timeframe in which the suspected violation occurred and your contact information. Visual Bill takes any report of Privacy violation very seriously and will investigate each report to the fullest extent possible.

Subject Access Requests may also be submitted to the details below.

privacy@visualbill.com  
Visual Bill, Inc.

### **AGREEMENT TO TERMS AND CONDITIONS**

Access to and use of Visual Bill sites by an individual shall form an acknowledgement and acceptance by such individual of these terms and conditions and this privacy policy.

**Changes to this Privacy Policy**

Visual Bill reserves the right to change this policy at any time and will post the Privacy Policy at

<https://www.visualbill.com/privacy-policy/>

Last updated: March 23, 2017