

FYISOFT Services Privacy Policy

FYISOFT SERVICES PRIVACY POLICY

SCOPE

This policy covers the privacy practices that FYISOFT, Inc. and its subsidiaries and affiliates ("FYISOFT" or "we") employ when providing support, consulting, Cloud or other services (the "services") to its customers ("you" or "your"). FYISOFT established this privacy policy in order to clarify that the use of information to which it may be provided access in order to provide services is more limited than the use of information covered by FYISOFT's [general privacy policy](#).

CUSTOMER INFORMATION AND SERVICES DATA

Customer Information is information that we may collect from your use of the FYISOFT Web sites and your interactions with us offline. We deal with customer information according to the terms of our [general privacy policy](#).

Services Data is data that resides on FYISOFT, customer or third-party systems to which FYISOFT is provided access to perform services (including Cloud environments as well as test, development and production environments that may be accessed to perform FYISOFT consulting and support services). FYISOFT treats services data according to the terms of this policy, and treats services data as confidential in accordance with the terms of your order for services.

To illustrate the difference between customer information and services data, when a customer contracts with FYISOFT for Cloud services, the customer provides information about itself, including its name, address, billing information, and some employee contact information. FYISOFT may also collect other information about the customer and some employees, for example through its web sites, as part of that interaction. All of that information is customer information, and is treated according to FYISOFT's [general privacy policy](#).

In contrast, having contracted with FYISOFT for Cloud or other services, the customer provides FYISOFT access to its production, development or test environment, which may include personal information about its employees, customers, partners or suppliers (collectively "end users").

HOW FYISOFT COLLECTS AND USES SERVICES DATA

Below are the conditions under which FYISOFT may access, collect and/or use services data.

To Provide Services and to Fix Issues.

Services data may be accessed and used to perform services under your order for support, consulting, Cloud or other services and to confirm your compliance with the terms of your order. This may include testing and applying new product or system versions, patches, updates and upgrades; monitoring and testing system use and performance; and resolving bugs and other issues you have reported to FYISOFT. Any copies of services data created

for these purposes are only maintained for time periods relevant to those purposes. **As a Result of Legal Requirements.**

FYIsoft may be required to retain or provide access to services data to comply with legally mandated reporting, disclosure or other legal process requirements.

FYIsoft may transfer and access services data globally as required for the purposes specified above. If FYIsoft hires subcontractors to assist in providing services, their access to services data will be consistent with the terms of your order for services and this services privacy policy. FYIsoft is responsible for its subcontractors' compliance with the terms of this policy and your order.

FYIsoft does not use services data except as stated above or in your order. FYIsoft may process services data, but does not control your collection or use practices for services data. If you provide any services data to FYIsoft, you are responsible for providing any notices and/or obtaining any consents necessary for FYIsoft to access, use, retain and transfer services data as specified in this policy and your order.

ACCESS CONTROLS

FYIsoft's access to services data is based on job role/responsibility. Services data residing in FYIsoft-hosted systems is controlled via an access control list (ACL) mechanism, as well as the use of an account management framework. You control access to services data by your end users; end users should direct any requests related to their personal information to you.

SECURITY AND BREACH NOTIFICATION

FYIsoft is committed to the security of your services data, and has in place physical, administrative and technical measures designed to prevent unauthorized access to that information. FYIsoft security policies cover the management of security for both its internal operations as well as the services. These policies govern all areas of security applicable to services and apply to all FYIsoft employees.

FYIsoft's security policies and procedures are reviewed and overseen by FYIsoft Information Technology (FIT). FIT is responsible for security oversight, compliance and enforcement, and for conducting information security assessments and leading the development of information security policy and strategy.

FYIsoft is also committed to reducing risks of human error, theft, fraud, and misuse of FYIsoft facilities. FYIsoft's efforts include making personnel aware of security policies and training employees to implement security policies. FYIsoft employees are required to maintain the confidentiality of services data. Employees' obligations include written confidentiality agreements, regular training on information protection, and compliance with company policies concerning protection of confidential information.

FYIsoft promptly evaluates and responds to incidents that create suspicions of unauthorized handling of services data. FYIsoft FIT are informed of such incidents and, depending on the nature of the activity, define escalation paths and response teams to address the incidents. If FYIsoft determines that your services data has been misappropriated (including by an FYIsoft employee) or otherwise wrongly acquired by a third party, FYIsoft will promptly report such misappropriation or acquisition to you.

DISPUTE RESOLUTION

If you have any complaints regarding our compliance with this privacy policy, you should first contact us at marketing@fyisoft.com. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with this privacy policy.

COMPLIANCE

FYIsoft's President acts as our Chief Privacy Officer. If you believe your services data has been used in a way that is not consistent with this policy, or if you have further questions related to this policy, please contact the President through our privacy and ethics hotline (president@fyisoft.com).