

Web Site and User Portal Privacy Statement

Effective December 2, 2013

This Web Site Privacy Statement ("Privacy Statement") tells our visitors and Solution subscribers ("you") about:

- a) The information Simac Document solutions ("SDS") collects through our website(s) and "related web sites" (the "Site(s)") and through certain services available on our Site(s) including the e-Invoicing User Portal (www.portal.simacds.nl);
- b) How we use that information;
- c) How we protect Personal Information
- d) How you can correct or remove Personal Information;
- e) Data retention

SDS offers products and services in the business-to-business market sector. As such, when SDS collects information about an individual (that is, personal information), it is generally only related to that person's role at his or her company, and is not related to him/her as a private person or as an individual consumer. This document describes SDS's policy for handling, processing, storing, and otherwise treating personal information submitted to certain Solutions (defined below).

SDS Customers may be referred to as "Buyer" or "Seller" throughout this document. Individual users of the Solutions (whether employees of the Buyer or Seller organizations) collectively and individually may be referred to as "you" and "your" throughout this document.

"Solution" means the SDS service which includes a link to this Privacy Statement, including but not limited to:

- a) Display of exchanged documents via the User Portal
- b) Manual creation of invoices using the User Portal
- c) Creation of visual representations of exchanged documents
- d) Creation of format mappings or communication connections using the User Portal
- e) Creation and display of Buyer or Seller Document criteria, Document processing statuses and other meta data

Consent

By accessing our Site, you are consenting to the information collection and use practices described in this Privacy Statement, as modified from time to time by us. If we decide to change our Privacy Statement, we will post a new statement on our Site and change the date at the top of the statement. Therefore, we encourage you to check the date of our Privacy Statement whenever you visit this Site for any updates or changes.

You should submit only publicly available, business contact information. Information submitted to the Solution may not include Sensitive Personal Information.

Use of Personal and other information by SDS

SDS will treat Personal and other submitted information as confidential (unless you or your account administrator submits it for public view using features of a Solution) and will use it only to: facilitate operation of the Solution and its related services; enhance use of the Solution and its related web pages; perform internal tracking and Solution improvement; enable SDS to contact you; process requested transactions through the Solution (including use of templates and document creation); analyze the volume and history of a company's Solution usage and, in general, perform analysis on the data and generate dashboards and reports.

What personal information do we collect on the Site and why?

We collect several types of information on our Site including "Personal Information", which generally is information that can be used to identify you individually, such as your name and email address. The information we collect depends on what Solutions you use on our Site(s). The following is a more detailed explanation of these types of information, as well as when and how we use it.

Contact Information

We may collect information that identifies you personally, such as your name and e-mail address, when You submit a form, such as, but not limited to, a request for information, a request for assistance, a purchase of a subscription to one of our add-on solutions, or when You register for the User Portal.

We may collect additional information if you choose to submit it, including your title and place of employment, business telephone number and mailing address, as well as the contents of your questions and/or comments submitted along with this information.

In the case of purchasing a subscription or a service some of this additional information is required. In general, we may use this information to respond to your inquiry, request your participation in a survey, provide you with the service that you've purchased, and contact you about Simac offerings that may be of interest to you.

IP Addresses

Each visitor to the Site is identified by an IP address during their visit and IP addresses are automatically captured by the Site management software. SDS uses this information to help improve the operation of the Site and may at some time use this information to help adjust the content of the Site to the general geographic location of the visitor and for reporting purposes.

Cookies

SDS uses small files called "cookies" to improve the quality of a visitor's interaction with the Site and to facilitate other advanced features. If you have set your browser to reject cookies, some features of the Site may not work properly

Visibility of Personal Information within a Solution

The SDS Solutions help companies make connections to facilitate business. Depending on the Solution, You (or your account administrator) may provide your business contact information to Trading Partners or potential Trading Partners via the Solution, if you are serving as a company contact for your business.

Information sharing or disclosure practices

SDS does not provide any of your personal information to third parties for their marketing purposes without your explicit consent, however SDS may use your information to contact you about SDS products and services unless you opt-out of such uses as provided below. The personal information you provide to a Solution may be accessed by

- a) third parties who help SDS operate the Site, help SDS process transactions, provide the services requested by you, or contribute to SDS sales and marketing efforts; and
- b) law enforcement and other government entities if reasonably required.

Transfer

This Site and its solutions are primarily located in and operated from The Netherlands. By submitting data to the Site or a Solution, you consent to having such data transferred to The Netherlands and other web site operation locations selected by SDS.

Protection of your Personal Information

Your privacy is important to us. Therefore it is stored in the same secure way as we store the financial information we process for you. All access to and transport of the information is encrypted and goes through our multi-tier communication API's so there is no direct access to this storage.

Web communication goes via secure HTTPS so this communication is encrypted too.

Correcting Account Information and your right to access your Personal Information

You have a right to access and modify your Personal Information and to delete your Personal Information, subject to constraints identified below.

In most Solutions, You can directly change most contact information by logging on to the User Portal and managing your profile directly. For certain Solutions, changes may be requested by calling SDS customer support.

If you are unable to correct, update, or delete your personal information due to the fact that you are no longer an employee of the business that is the account holder, or your account has been terminated, you may contact the SDS customer support. In each case, SDS will take reasonable measures to accommodate your request or respond in writing with the legal basis for denying the request within thirty (30) days.

Data Retention

SDS will store Personal Information in active databases for varying lengths of time depending upon the specific Solution, type of data, and applicable law. Due to the close integration of data with the

Solution, Personal Information might be stored by SDS in backup logs and files for the duration necessary for legal requirements or the purposes described in this policy. However, SDS makes no commitment to indefinitely store such data.

Links to other Sites

The Site may contain links to third party web sites such as the web sites of SDS partner companies. SDS takes no responsibility for the content or information practices of such sites.

Contact information for inquiries

For any questions regarding the storage or usage of your Personal Information, please contact our Support department via email: privacy@e-invoicing.simacds.nl