



THURSBY SOFTWARE SYSTEMS, INC., GENERAL DATA PROTECTION REGULATION *TERMS OF SERVICE & PRIVACY POLICY*

Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to Thursby Software Systems, Inc., (Thursby) employees and strictly enforce privacy safeguards within the company. At Thursby we are committed to protecting your privacy. This describes how we collect and use your personal information and the terms and conditions of using our website.

Collection and Use of Personal Information

Personal information is data that can be used to uniquely identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with Thursby or a Thursby affiliated company. Thursby and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising.

How We Use Your Personal Information

The personal information we collect allows us to keep you posted on Thursby's latest product announcements, software updates, and upcoming events. It also helps us to improve our services, content, and advertising. If you don't want to be on our mailing list, you can opt out anytime by unsubscribing.

We also use personal information to help us develop, deliver, and improve our products, services, content, and advertising. We may also use personal information for internal purposes such as auditing, data analysis, and research to improve Thursby's products, services, and customer communications. If you enter into a contest or similar promotion, we may use the information you provide to administer those programs.

How Do You Collect Personal Information?

There are two ways we collect data through our website, we collect your personal data as part of the customer's purchase process via our website following the General Data Protection Regulation (GDPR) provisions of contractual obligation, legal obligation and consent. That means that we only collect what you give us or have agreed we can have; for example, when



making a purchase we require to collect your name, address, and bank details. However, in order to supply you with marketing communications about offers and services we may need to obtain your consent.

Our website does also use cookies, which collect a certain amount of personal data. Further information about our cookies policy and usage detailed below.

Collection and Use of Non-Personal Information

We also collect non-personal information – data in a form that does not permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

What We Collect

As part of the sales process when using our website, we collect some of the following information:

- a. Full name
- b. Contact information including email address
- c. Demographic information such as, but not limiting to, ZIP/Postcode
- d. Financial data

We believe we should only collect personal data if we couldn't do our job without it. What information we collect depends on the reason for collecting it.

You have the right to withdraw consent to receiving marketing information at any time, no questions asked. If you would like to withdraw consent to processing, you can do so by e-mailing dpo@Thursby.com. You can also turn off cookies if you don't want to use them. However, we cannot guarantee all our website's functionality will be optimal if you turn off cookies.

Children

We do not knowingly collect personal information from children under 13. If we learn that we have collected the personal information of a child under 13 we will take steps to delete the information as soon as possible.

International Users from the European Union

Information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. Thursby abides by the General Data Protection Regulation (EU) 2016/679 [GDPR] (referenced by link here: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&rid=1>), and the Privacy and Electronic Communications Regulation (EC) 2003 [PECR] subsequently amended (referenced by link here: [Privacy and Electronic Communications Regulation \(EC\) 2003](#)), which impacts on Thursby Software Systems (Thursby) as regards the processing of personal and special category data.

Links to Other Websites and Social Media

Our website might contain links to other websites we might feel you will have an interest in or to our Social Media pages. Thursby takes no responsibility for the content of external internet sites. The existence of a link from any organization's site to Thursby site does not imply that Thursby endorses the activities or views of that organization.

This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website, we recommend you read the privacy policy of that website before sharing any personal or financial data.

You may wish to link to our web page, prior consent must be obtained before doing so, any such links must not damage our reputation or take advantage of it, and you must not establish a link in such a way as to suggest any form of association, approval or endorsement on our part where none exists.

Disclosure to Third Parties

At times Thursby may make certain personal information available to strategic partners that work with Thursby to provide products and services, or that help Thursby market to customers. Personal information will only be shared by Thursby to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

Service Providers

Thursby shares personal information with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our

products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever Thursby operates.

Others

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for Thursby to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

Who Can I Contact About This?

If you want to know more about our data protection practices, or for advice on exercising your information rights, please contact our Support Service Director who is our acting Data Protection Officer

T: +1 (817) 478-5070
E: dpo@Thursby.com

If you would like to find out more about how we use cookies, please contact our Operations Director, responsible for our website and social media content.

T: +1 (817) 478-5070
E: opsdir@Thursby.com



The Marketing and Communications Manager moderate comments on our website and social media accounts to protect those who view them. We will challenge, rather than delete, inaccurate comments or data, and remove anything that is:

- a. Slanderous
- b. Libelous
- c. Discriminatory
- d. Abusive
- e. Contains offensive language

Please be aware that we cannot remove Facebook 'likes' and comments on Facebook and Twitter posts are public.

If you have a complaint or comment about how we moderate social media, please contact dpo@Thursby.com.

Cookies and Other Technologies

Thursby's website, online services, interactive applications, email messages, and advertisements may use "cookies" or other web technologies. These technologies help us better understand user behavior, tell us which parts of our website people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information.

Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Thursby and our partners also use cookies and other technologies to remember personal information when you use our website and applications. Our goal in these cases is to make your experience with Thursby Software more convenient and personal.

If you want to disable cookies and you're using the Safari web browser, go to Safari preferences and then to the Security pane to disable cookies. With the PKard™ mobile software, go to Settings, then and then to the Cookies section. For other browsers, check with your provider to find out how to disable cookies.

As is true of most websites, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet



service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, and to gather demographic information about our user base as a whole. Thursby may use this information in our marketing and advertising services.

How We Use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

How Do You Use My Personal Data?

We will only use your personal data for the reason we originally collected and in ways you would expect. That means to provide you with the services or information you have requested, for administration of those purposes, and for business planning (so we can keep providing you and others with those services).

We will never sell your details to third parties, and if we have to share it with anyone (for example, to process a Customer Survey) we will ask your permission first or it will be clearly stated as part of the service you have asked us to provide.



How Do You Store and Protect My Personal Data?

Thursby takes precautions — including administrative, technical, and physical measures — to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

Thursby's online services such as the Thursby Software Online Store use Secure Sockets Layer (SSL) encryption on all web pages where personal information is collected. To make purchases from these services, you must use an SSL-enabled browser such as Safari, Firefox, or Internet Explorer. Doing so protects the confidentiality of your personal information while it's transmitted over the Internet.

When you use some Thursby products, services, or applications or post on a Thursby forum, chat room, or social networking service, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

Your information is stored on our computers and backed up on servers in the United States of America, and access to personal data is restricted according to the user's needs; some information is restricted to key personal only.

We place a great importance on the security of the data we hold on our members and we have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. Where we share data externally the data is encrypted and strict usage and deletion after usage policies are in place.

Thursby makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information only for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. We have strict retention periods for different kinds of personal data.

When It Comes to My Personal Data, What Are My Rights?

The General Data Protection Regulation (GDPR) gives you rights that enable you to check how your personal data is being collected and used, as well as to prevent it being used in ways you don't like.

If you want to exercise any of these rights, or know more about them, you can contact our Information Support Service Director who is our acting Data Protection Officer.



T: +1 (817) 478-5070
E: dpo@Thursby.com

Subject Access

You have the right to a physical copy of the personal data that we hold about you, to know where we got that information, how we used it, if we shared it with anyone, and how long we kept it for. And we have to provide that to you within one month of receiving your request and proof of your identity. Some organizations charge a fee for this, but we don't. If you want to make a subject access request, please email our Support Service Director at dpo@Thursby.com, or write to us at:

Thursby Software Systems, Inc.
Support Service Director
4901 S Collins Street
Arlington TX 76018 USA

Automated Decision Making

We don't make any decision based solely on automated means, but if we did you would have the right for a human to review that decision.

Rectification, Blocking and Erasure

You have the right to have your personal data amended, erased, or blocked from being used further, if we got any of the details wrong or if our using your personal data is causing you distress.

If you're aware that we have your details wrong and you'd like us to change or erase them, please contact via email dpo@Thursby.com, or by mail:

Thursby Software Systems, Inc.
Support Service Director
4901 S Collins Street
Arlington TX 76018 USA

If we have made an error, please permit us to make it right. You can file a complaint about how we used your personal data by contacting our Support Services Director



Other people's websites are of course outside of our control. If you access those sites, the operators may collect different kinds of personal information and use it in different ways than we do.

Privacy Questions

If you have any questions or concerns about Thursby's Policy or data processing, please contact us. Thursby may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with this updated Privacy Policy.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

By accessing our website, you agree to be bound by the following Terms and Conditions

General

Your use of this site constitutes acceptance of these terms and conditions as at the date of your first use of the site. Thursby reserves the right to change these terms and conditions at any time by posting changes online. Your continued use of this site after changes are posted constitutes your acceptance of this agreement as modified.

You agree to use this site only for lawful purposes and in a manner, which does not infringe the rights or restrict, or inhibit the use and enjoyment of the site by any third party.

The site is available on the world wide web and accessing our website is not restricted to anyone, but certain features may be available for Customers only. To access Customers-only information a user name and password may be required. Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone.

This site and the information, names, images, pictures, logos regarding or relating to Thursby Software Systems, Inc., are provided "as is" without any representation or endorsement made and without warranty of any kind whether express or implied. In no event will Thursby Software Systems, Inc., be liable for any damages including, without



limitation, indirect or consequential damages, or any damages or loss of profits whatsoever arising from the use or in connection with such use or loss of use of the site.

Thursby does not warrant that the functions contained in the material contained in this site will be uninterrupted or error free, that defects will be corrected, or that this site or the server that makes it available are free of viruses or bugs, nor do we guarantee the full functionality, accuracy and reliability of the materials.

Restrictions

Commercial use or publication of all or any material displayed is strictly prohibited without prior written authorization from Thursby. Nothing contained herein shall be construed as conferring any license by Thursby to use any material displayed.

Any communication or material that you transmit to, or post on, any public area of the site including any data, questions, comments, suggestions or the like is, and will be treated as, non-confidential and non-proprietary information.

If you wish to make any use of material on this site, please send your requests to dpo@Thursby.com.

Governing Law

The Thursby Privacy Policy, and the terms and conditions of our products shall be governed and construed in accordance with the laws of the State of Texas, USA.

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