Terms and Conditions of the VAT Connection

Please read these terms of service ("Terms", "Terms of Service") carefully before proceeding to authorising a VAT number ("VAT Registation Number", "VRN") to Anthesis Integrate (the "service") operated by Anthesis Ltd ("us", "we", or "our") via HMRC's ("HM Revenue and Customs") API services.

By proceeding to au this VAT number to Anthesis Integrate you agree to store data associated with the VAT registration and to share the data with HMRC. Information including also unique identifying factors of the users of the application. It is your responsibility to notify all users which will use making transactions using Anthesis Integrate's MTD solution regarding the data they will be sending to HMRC.

The data we store which we will share to HMRC is the VAT registration number itself and the following unique identification markers:

- Client browser's "Do not track" marker.
- Browser user agent.
- Broswer generated "Device ID".
- Client device ID.
- Public IP Address of the client's connection to the service.
- Public port of the client's connection to the service.
- Client's Screen resolution, scaling factor (DPI) and colour depth of the screen.
- Client browser's window size.
- Timestamp of when each data point is collected.

We are required by law to send this data for fraud prevention. HMRC monitor transactions to help protect your confidential data from criminals and fraudsters. To make this possible, we must send audit data to HMRC as show in the list above.

When we use HMRC's MTD APIs, we submit the data via HTTP headers which is sent from your browser's metadata to our API server which is then sent to HMRC. The fraud prevention data which HMRC specifically require we do not store in our databases and are submitted to HMRC at the time of each API call. HMRC use the data to support prosecutions for tax and duty fraud.

As stated on HMRC's fraud prevention page, HMRC has the right to collect audit data. We follow best practices set out by the Information Commissioner's Office. Transaction monitoring is a key security approach used in the UK and globally. HMRC's approach follows the National Cyber Security Centre (NCSC) and the Cabinet Office's recommended guidance (PDF).

You can also check the regulations located here

- http://www.legislation.gov.uk/uksi/2019/360/made?_ga=2.153533240.1414341963.1669728945 -1973807195.1654787534

If you do not agree to these terms, decline the agreement which will stop all further proceedings.

General Data Protection Regulation (GDPR)

and the Data Protection Bill (to repeal and replace the Data Protection Act, 1998)

Privacy Notice - Commercial Activities

Data Controller:

Anthesis Limited, Riverside, Mountbatten Way, Congleton, Cheshire, CW12 1DY

Person with responsibility for data protection compliance within the Company:

Tom Constantine, Director, who can be contacted via email at <u>dpo@anthesis.co.uk</u>

What information does Anthesis collect?

- 1. Anthesis Limited (Anthesis, the Company) collects and processes personal data and information as an integral part of its wide-ranging commercial and business development activities. This Notice tells you how Anthesis manages any personal information it holds about you.
- 2. Anthesis is committed to meeting its data protection obligations. If you decide to give us personal information as part of establishing or maintaining a commercial and/or business relationship, this information will be held and processed by Anthesis in accordance with the General Data Protection Regulation.

As part of this, the Company recognises the proper obligations upon it to protect your privacy. The Company is also committed to being transparent about how it uses the personal information collected as part of its commercial and business development activities.

- 3. Anthesis collects and processes a range of information about you. This includes your name, your Company and/or employer's name, your job title, your business address, and your business contact email address, telephone numbers, and social media contact details.
- 4. Anthesis collects this information in a variety of ways. You may have chosen to give us the personal information because you wanted Anthesis, or one of its two strategic partners, Industrial & Financial Systems (IFS) and Infor, to process a business request for you. These types of request often include, for example, providing you with information about the Company's products or services, or to provide a business proposal and/or quotation, or to place an order or commission a contracted assignment.

You may have given us your personal information by direct contact with Anthesis, initiated by you. Alternatively, you may have given us your personal information as part of a business meeting or as part of the wide range of professional conference, networking, and business referral activities that Anthesis participates in.

Anthesis does not generally collect personal information about you from third parties. Where this does occur, Anthesis will only do this with your prior consent. Anthesis will also let you know if personal information about you is collected from other open or public sources, including the internet and social media platforms.

5. Personal information about you will be stored in a number of different places. These include the Company's commercial contact database, the Company's marketing and sales database, the Company's email system and the mobile telephones provided to and used by Company employees.

Why does Anthesis process personal information?

- 6. Anthesis offers a range of business and commercial services which, if you choose to use them, will require information from you in order to work. The Company collects, controls, and processes personal information for a number of purposes, including –
- To process information as part of entering into a commercial contract with you and/or your employing organisation, and to meet its obligations under any such contract, including IT log-on details, and payment and related financial transactions
- To process and perform the services you have requested, including the supply of businessrelated information about Anthesis and the Company's range of products, services, and opportunities
- To help the Company to create and deliver content that will be most relevant to your business needs
- To alert you to new services and other business-related information, unless you have optedout of receiving such information
- To make on-going contact between you and Anthesis easier, by not requiring you to enter your personal information more than once
- To enable the Company to undertake standard business analysis, including charting business development trends to inform future marketing and sales plans, and to inform the future development of the Company's services

This commercial and business-related information relates to the products and services available from Anthesis and the Company's strategic business partners, IFS and Infor.

7. Anthesis recognises and respects that personal information will only be used for the purposes for which it was supplied. The Company also recognises that you may not wish to be contacted again after the original reason for establishing contact has been fulfilled. You can opt-out of receiving information from Anthesis at any time by contacting Tom Constantine, Director, via email at <u>dpo@anthesis.co.uk</u>

. You can opt-out from receiving all information from the Company, or from receiving specific categories of information designated by you.

Who has access to the information?

- 8. Your personal information will be shared internally with Company employed colleagues where access to the data is necessary for the performance of their job roles and the delivery of service to you.
- 9. In circumstances where Anthesis is entering into a commercial contract and/or business delivery assignment with you and/or your employing organisation, Anthesis will need to share your personal information with designated third parties to enable the contract and/or work to be performed. This most commonly involves use of Anthesis Partners, Agents, or Consultants working under a contract for service with Anthesis. In such circumstances your personal information will only be provided to such third parties with your prior consent.
- 10. Anthesis may disclose your personal information to others in connection with any legal or prospective legal proceedings, and/or in order to establish, exercise or defend the Company's legal rights.
- 11. Anthesis will not, without your express prior consent, provide your personal information to any third parties for the purpose of direct marketing.

12. Anthesis operates on a global basis, as part of the Enterprise Resource Planning (ERP) sector. The information that the Company collects may be stored, processed in, and transferred between any of the countries in which Anthesis and/or its' client organisations operate.

Subject to the Company's standard internal security arrangements, the information can be accessed from anywhere in the world. In all circumstances the information will be controlled and processed in accordance with the provisions of this Privacy Notice.

How does Anthesis protect data?

13. Anthesis takes very seriously the security of the personal data and information it controls and processes for commercial and business-related purposes.

The Company takes all reasonable technical and organisational precautions and measures to prevent loss, accidental destruction, misuse, alteration, or disclosure of your personal information. These measures include use of a secure databases, together with internal policies and systematic updating of the controls to protect personal data. These internal controls also ensure that access to personal information is restricted, and cannot be accessed other than by properly authorised persons in the proper performance of their duties with Anthesis.

All Company employees and Partners, Agents, and Consultants are properly briefed about the responsibility to keep your personal information secure.

Data transmission over the internet is inherently insecure. Anthesis cannot guarantee the security of data sent over the internet.

- 14. Anthesis does not buy or sell personal information.
- 15. Where the Company engages third party Partners, Agents, or Consultants to process personal information on its behalf, such parties operate in accordance with the appropriate Anthesis control policies and arrangements. Additionally, the contract for service with such Associates includes express duties of confidentiality and non-disclosure, together with an obligation to implement appropriate technical and organisational measures to ensure the security of personal data and information.

For how long does Anthesis keep personal information?

- 16. Anthesis will hold your personal information for the duration of your commercial and business-related contact with the Company.
- 17. Anthesis will hold your personal information after the end of your commercial and businessrelated contact with the Company for 6 years, in accordance with the UK Limitation Act. In the case of financial information, the retention period will be 6 years from the end of the financial year in which the transaction was made. After this period the information will be archived or safely destroyed.

Your individual rights and responsibilities

18. As a data subject, you have a number of rights. You can -

- Access and obtain a copy of your personal information on request
- Require the Company to change incorrect or incomplete personal information

- Require the Company to delete or stop processing your personal information eg where the information is no longer necessary for the purposes of processing
- Object to the processing of your personal information where the Company is relying on its legitimate interests as the legal ground for processing
- 19. If you want to exercise any of these rights, please contact Tom Constantine, Director, via email at <u>dpo@anthesis.co.uk</u>. Tom is the person with responsibility for data protection compliance within the Company.
- 20. The Company recognises that the personal information in holds about you is likely to change over time. You may change your employer, or your job role and contact details may change. Anthesis will, as part of it's normal good housekeeping, undertake appropriate data up-dating and cleansing operations. However, if the personal information the Company holds about you needs to be corrected or updated, it is always helpful if you are able to promptly notify required changes via email to <u>dpo@anthesis.co.uk</u>
- 21. If you believe that Anthesis has not complied with your data protection rights, you can complain to the Information Commissioner.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Cookie Policy

This Cookies Policy explains what Cookies are and how We use them. You should read this policy so You can understand what type of cookies We use, or the information We collect using Cookies and how that information is used. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about You may be linked to the information stored in and obtained from Cookies. For further information on how We use, store and keep your personal data secure, see our Privacy Policy. We do not store sensitive personal information, such as mailing addresses, account passwords, etc. in the Cookies We use.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Cookies Policy:

- Anthesis (referred to as either "the Company", "We", "Us", "Our", or "Our Company" in this Cookies Policy) refers to our web application.
- Cookies means small files that are placed on Your computer, mobile device or any other device by a website, containing details of your browsing history on that website among its many uses.
- Website (referred to as either "the Website", "Website", or "Web Application" in this Cookies Policy) refers to this / our website.
- You means the individual accessing or using the Website, or a company, or any legal entity on behalf of which such individual is accessing or using the Website, as applicable.

The use of the Cookies

Type of Cookies We Use

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser.

We use both session and persistent Cookies for the purposes set out below:

• Necessary / Essential Cookies

Type: Session Cookies, Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

• Functionality Policy / Notice Acceptance Cookies

Type: Persistent Cookies, Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

Your Choices Regarding Cookies

If You prefer to avoid the use of Cookies on the Website, first You must disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this website. You may use this option for preventing the use of Cookies at any time.

If You do not accept Our Cookies, You may experience some inconvenience in your use of the Website and some features may not function properly if at all.

If You'd like to delete Cookies or instruct your web browser to delete or refuse Cookies, please visit the help pages of your web browser.

- For the Chrome web browser, please visit this page from Google
- For the Internet Explorer web browser, please visit this page from Microsoft
- For the Edge web browser, please visit this page from Microsoft
- For the Firefox web browser, please visit this page from Mozilla
- For the Safari web browser, please visit this page from Apple

For any other web browser, please visit your web browser's official web pages.

Contact Us

If you have any questions about this Cookies Policy, You can contact Tom Constantine, Director, who can be contacted via email at <u>dpo@anthesis.co.uk</u>