

PRIVACY POLICY

nQueue Billback LLC is committed to maintaining the privacy and security of your information.

This Privacy Policy forms part of the Virtual Cabinet Licence Agreement and General Terms and Conditions and to use the software you must consent to this Privacy Policy. All terms defined in that Agreement have the same meanings in this Policy.

This policy can be viewed on our [website](#).

Please familiarise yourself with our Privacy Policy to understand:

- the kind of information we collect and hold;
- how and when we may collect and hold information from you;
- the purposes for which we collect, hold use and disclose your information and what happens if we don't collect the information;
- the limited circumstances where we are likely to disclose information to other recipients including where they may be overseas; and
- how you can contact us to access or correct information which we hold about you or complain about our collection, handling or disclosure of your information.

By using the products, you signify you have read, understood and consent to our Privacy Policy.

The collection of information

Purpose

We only collect and process information for purposes which relate to our business, functions and activities. Without your information, we may not be able to deliver or give you access to our products, or provide you with technical assistance or updates for our products.

We collect information in relation to the following purposes:

- registering or activating the software or other products;
- verifying and authenticating your purchase, initially and then during your period of use of products, or where you may have changed details of the computer you are using with the products;
- providing installation key codes, access codes or other related access details;
- invoicing;

- refunds and dealing with warranty issues;
- providing technical support, assistance, consulting services and training;
- improving our products generally and the software; and
- generally, to enable us to provide the products and information needed to ensuring you are able to enjoy the maximum benefit of our products.

Where you provide us with information about someone else, for example other authorised users of our product(s), and employees, you must have their consent to provide their information to us based on this Privacy Policy.

We may also collect and use your information to:

- promote our products, goods and services to you;
- to provide you with more relevant and personalised information to be more relevant to you and your business;
- use the information to promote goods, services and products to you of some of our network of associated service providers and product vendors;
- to de-identify your information, and using the de-identified information for internal use for the purposes of analytics with regard to use of our products, development, training and demonstration of our products; or for benchmarking and/or or sale to third parties.

When we collect information

We most commonly collect information directly from our customers or their authorised representatives. Sometimes we may collect information from a third party or a publically available source, but only if the person has consented to such collection.

In summary, we most commonly collect information when you:

1. Engage in product related activities, such as:
 - when you purchase, register, install or use our products
 - when you use our technical support or consulting services
 - when you participate in nQueue Billback LLC programs, eg: as a member of our partner programmes, including as a re-seller
 - when you provide us with copies of your database or give us access to your database and systems so that we can provide you with the technical support or consulting services you may have requested.
2. Engage with us in other ways, such as:

- in your normal communications with us, when you email, telephone us or give us your business card
 - attend public functions, events, seminars, roadshows, conferences, training run by or at which nQueue Billback LLC is present
- enter competitions
 - use our website
- participate in forums, such as any community or use other social media tools through our website or in relation to our goods, services and products

Transfer of Information from the USA

nQueue Billback LLC may use data processing facilities provided by Amazon AWS, Equinix and Microsoft which are principally located in Sydney, Australia but may incidentally include other locations from time to time.

In order to provide the products to you, we may transfer your information out of the United States when you register for, subscribe to and use our goods, services and products. This is necessary to give you access to our goods, services and products.

We may also carry out such processing in Australia as may be necessary to perform our contract with you or to implement measures requested by you.

If transferred, your information will be securely stored on cloud storage infrastructure which we license from third parties including Amazon AWS, Equinix and Microsoft. We have entered into binding contractual safeguards to protect your information while it is being processed by Amazon AWS and Microsoft. You can view a copy of those terms [here](#).

Examples of circumstances in which we may transfer your information include when you register for and subscribe to our products, when we update or process your billing details, and when we conduct anonymised benchmarking and other analysis to improve our goods, services and products.

You have authorised this transfer in entering into the licence agreement with nQueue Billback LLC and have given your consent before using our goods, services and products.

When you purchase and use our goods, services and products, technical support and join any nQueue Billback LLC programs we may collect information from you and others whose details you use with their consent:

- Upon purchasing by you of any of our goods, services and products offered through any sales channels.

- Upon registration by you of any of our goods, services and products offered any sales channels.
- Upon entering an agreement with us for the installation or implementation of our goods, services and products.
- Upon the purchasing of upgraded versions or renewal of subscription versions of our goods, services and products, often in response to our having communicated with you about such upgrades.
- When you use the our goods, services and products or any of their constituent products.
- When you use our website, community forum, blogs, message boards, & social media links from our website.
- Upon the joining, or renewal, of various nQueue Billback LLC programs.
- Upon seeking to become a product reseller where stock is provided on credit, we may seek financial details before approving the appointment as a reseller.
- When you contact us for technical support or, in relation to our goods, services and products you may also contact us for consulting services, whether online, telephone or in person. Please refer to “*Disclosure to overseas recipients*”, to understand when your information may be disclosed to an overseas recipient, when using our technical support or consulting services.
- We also collect information indirectly from our partners relating to our goods, services and products you have purchased through them.

Information may also be collected when customers sign up for add-on services provided by third party suppliers such as banking services (eg for bank data downloads), or merchant accounts, other payment services, SMS text services, share trading services, wealth management, bill payments services and the like.

In these cases and because you have elected to use these third party services your information may also be passed on to these third parties and will be processed, disclosed and protected in accordance with the third party’s respective privacy policy.

When your contact with us does not relate to a purchased product

We also collect information at other times, which do not relate specifically to your purchase or use of our goods, services and products, as described below:

- From delegates who attend our roadshows, briefings, seminars, product training and demonstrations, as well as other public events where registration forms and feedback forms are filled out by attendees.

- From entrants in nQueue Billback LLC competitions, wherever offered, such as via direct mail campaigns, a website, social media or any other media, at seminars or public events, which may or may not be hosted by nQueue Billback LLC.
- Upon registering to request information from us on our website or your responses to offers or other marketing campaigns, competitions on our website or direct marketing campaigns.
- Use of our website, community forum, blogs, message boards, & social media links from our website.

If you do not wish us to contact you following such contact please advise us at the time of such contact or immediately following our first use of your information thereafter. We will not make it a condition of these activities that you consent to our receipt of your information nor its retention or any other use. You will be asked to consent to such use by nQueue Billback LLC.

The types of information we process

The information collected from you or your authorised agent directly, would generally comprise name, address, postal address, telephone, fax and e-mail contact details, other authorised users of your product, where applicable, as well as the details of the product that you use.

High level information in relation to your business may be also be collected and may include details of your industry or profession, for the purpose of better understanding your business and needs in relation to our product.

We collect information from you when installing the product and use of your product, ie a file on your hard drive records the date of installation, such as the unique product number of the computer, collected in relation to your use of the software, for example which may include internet protocol address, hardware identification, operating system, application software, peripheral hardware, non-personally identifiable software usage statistics.

Using our website or social media tools

Depending on the type of activity you are engaging in, we may collect information directly and indirectly when you use our website or social media tools. We may also collect unidentifiable information from you relating to the pages you visit etc. See also "*Website*" and "*Social Media & Public Forum*" below.

Where you have provided your personal details when visiting our website, such as any membership, account or customer details, or registered for an activity, entered transactions you have entered whether paid or free, we may also collect information from you relating to how you use our website, the pages you have viewed, nature of the requests or enquiries you have made etc.

Technical support or consulting services

If you request technical assistance or, in relation to our goods, services and products, consulting services, you may contact us online, telephone or in person. We may require the following information from you in order to provide you the assistance needed:

- information relating to your problem and our suggested solutions are also recorded by us to assist in better customer relationship management;
- you may also need to provide copies of your data or grant access to your database, provide password, pin or other access details in order that we may assist you with your problem or inquiry. Where passwords or other access details are provided, we strongly recommend that you update those access details once your issue has been resolved;
- you may also be required to provide other details for the purposes of identification and verifying authorisations to provide support, such as if you require us to make any changes to your account or settings;
- information collected from you in relation to technical support or consulting services may be obtained from you online or by telephone, and in the case of consulting services, they may also be obtained on or off your premises.

How we use and handle this information

Where information is collected in relation to the purchase or use of our goods, services and products, we use your information in the following ways:

- We collect information so that we can communicate with you about the goods, services and products that you use and efficiently manage and administer all the goods, services and products we provide to you. These communications could relate to software upgrades, feature variations or enhancements, billings any particular issues or problems that have been detected within the software and corrective measures that may be taken, and informing you of other products, including the availability of specialised, software specific, stationery products, debt recovery services, software training services, share trading services, banking services, seminars relating to associated products such as share trading classes and other types of classes.
- Identification and revalidation of software end-users assists nQueue Billback LLC in establishing who is legally permitted to use the various products and therefore assists us in enforcing copyright and intellectual property rights.
- Product information collected when it is installed or used assists us to regularly revalidate that the product is being used on the correct computer and is not installed on other computers without your authority and outside the terms of our licence.
- The information we collect from you relating to your use of the products facilitates the provisioning of updates, support, invoicing or online services to you.

- Aggregated information:
 - We may also aggregate information which does relate to you to help us to monitor and improve the effectiveness of our website and overall communication to you, for example, providing you information and products relating to matters for which you have indicated an interest in your browsing of our website, or participation in our online activities, requesting information from about products, articles, technical support etc.
 - We may also aggregate (and de-identify) information which does not relate to you (containing no information identifiable to a specific person) which is collected:
 - in relation to your purchase and/or use of our goods, services and products or relating to use of our website, social media and blogs etc, it may sometimes be used for research and analysis purposes by us or contracted service providers for us to better understand statistical trends in industry and product usage; or
 - from databases created using our online or hosted products. This information is first de-identified then may be used for benchmarking and/or for sale to third parties.
- Financial information:
 - In the case of financial information requested from parties wishing to be resellers this information is used to perform credit referencing and checking.
 - Where credit card information is provided, we use it solely to check your financial qualifications and/or to collect payment from you.
- Technical support or consulting
 - Your information will only be used or accessed for:
 - the purposes of resolving your technical issue with the product; and
 - in some instances your information may be used or shared with other departments or entities within the nQueue Billback LLC group of companies, including in Australia and the United Kingdom, for the purposes of improving our product or business; or
 - your information will be de-identified and used for product development training and the demonstration of our goods, services and products; and
 - once your issue has been resolved your information is returned, destroyed or de-identified.
- Where you might have purchased a product from one of our network of partners:

- then the relevant partner will also have your information and they may from time to time contact you for the purpose of renewal of subscriptions based upon our records of whether or not you have renewed;
 - we may at the request of a partner provide information relating to the status of licences held by people who have purchased a product from the relevant partner; and/or
 - we may provide de-identified information to our partners, who may or may not be the partner you purchased a product for market analysis, eg number of current licences for our products held in specific region etc.
- To communicate and promote our good, services, products and business.

If the information was collected through your other contact with us, ie. not relating to your purchase or use of our product(s), we use your information in the following ways:

- To follow up any enquiries you may have made regarding our business or products and, because of the circumstances or express instructions from you, we will communicate with you about products we understand you have or a likely to have an interest. Most of this communication with you will be by email. In all email communication of this kind with you, you will have the opportunity to opt out of any further emails.
- To tailor our communication with you to ensure the information and communication you receive from us is relevant to you.
- To assess and improve the effectiveness of our website and communication with you.
- To communicate and promote our products and business.

We will cease to do so on your request.

Direct marketing

We will only use your information for direct marketing where we have obtained your consent. In the absence of express consent from you, we will only use the information in a way that you would reasonably expect your information to be used in relation to our business and products. For example, if you provide your business card to one of our employees at an event, we may communicate with you about our products or future events, unless you instruct us not to do so. In all our direct marketing to you, you will always have the ability to request us to discontinue sending to you any further of such direct marketing material to you.

If you would prefer not to receive communications from us that do not relate to any products to which you have subscribed or which you have purchased, please contact us as follows:

nQueue Billback LLC

7890 S. Hardy Drive Suite 105

Tempe, AZ 85284

Tel: 866-206-5285

Support: 866-206-5285

virtualcabinetusa@reckon.com

Disclosure

We will only use the information for the purpose for which it was given to us, or for purposes which are directly related to one of our functions or activities. We would only disclose information such as when:

- You have consented;
- It is otherwise required or authorised by law

Information collected may be shared with other subsidiaries within the nQueue Billback group of companies for use in the provision and improvement of their products to you. Where information is shared within this group it will be disclosed and handled in accordance with the terms of this Privacy Policy.

We will not disclose your information outside the group save with your consent or as described in this Privacy Policy; if you have not given consent for these purposes we will seek your consent before disseminating your information in the following ways :

- Where an external party wishes to communicate with any or all parts of the group, and we are agreeable to this communication being sent;
- Information may be provided to third party technical support services located outside the United States, for the purposes of dealing with technical support issues you may have raised to assist you and/or or which may also assist us to improve our product and process generally.
- If you have signed up for add-on services provided by third party suppliers such as banking services, bank data downloads, superannuation payment services, merchant accounts, SMS text services. In these cases information may also be passed on to the third party and will be used, disclosed and protected in accordance with the third party's respective privacy policy. Such sign up will confirm your consideration and approval of the privacy policy of such third parties and your consent to such provision;
- nQueue Billback LLC may use, from time to time, external service providers to facilitate communications with its customers, for example a mail house. In these circumstances, we may provide personal contact/address information to the external service provider to enable the communication to be dispatched. Such information is provided to the external service provider on the strict basis that it be used for this purpose only and that their handling of the information provided to them complies with this Privacy Policy;

- where the information is disclosed to a credit referencing bureau;
- if required by law or to comply with a law, court order or legal process.

In the event there is a transaction which involves the sale or any or part of our business assets, it is possible that information we possess may be transferred as part of the transaction. Further, where reasonably practicable, we will specify that the information must be handled in accordance with this policy.

Website

You may explore and browse our website without providing any information about yourself. When you visit our website, for example, to purchase any goods, services and products, or enrol into a training course, technical support, contribute to a forum, register for an event, participate in a competition or promotion, request further information from us, we generally request that you provide information about yourself primarily so that we can respond to your query, provide you with further information, confirm your details, booking etc.

You may choose not to provide this information but this would prevent or minimise your ability to experience the full features of the website, such as online payments, access to some subscription products, restrict access to certain areas of the website or activities.

The website uses:

- "cookie" technology. What are cookies? Cookies are pieces of information that a web site transfers to an individual's hard drive for record-keeping purposes. Cookies make web-surfing easier for you by saving your passwords, purchases, and preferences while you're on a website. The use of cookies is an industry standard - you'll find them at most major web sites. You have the ability to accept or decline cookies if you prefer. If you choose to decline cookies, you may not be able to experience the full features of the website.
- "navigational information". This is information about your computer and your visits to this website such as your IP address, geographical location, browser type, pages viewed, referral source. We use this information to improve the website. We may combine the navigational information and personal information to provide you with more tailored information about our products and business.

Social media & public forum

Our website includes social media tools, such as the Facebook Like button, share this button. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. The social media tools are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the Privacy Policy and other relevant policies of the companies providing them.

We also offer publicly accessible community forums, message boards and blogs. Please be mindful that any information you directly disclose through our public message boards, blogs, or forums, may be collected and used by others. We will correct or delete any information you have posted on the websites if you so request, please refer to “*Access to Information and Complaints*” section below.

Third party service providers

We engage third party service providers to provide services to users of our websites and products and may need to share information, or give access to your information in order to provide information or products to you. The types of third party services may include analysing data, providing marketing assistance, technical support, consulting and training services relating to the installation, use, development, maintenance and support of our products, and others providing office and document management services, such as Microsoft Office 365.

Information held by third parties

Third party websites

Our website and Products may link to other websites. We do not control and are not responsible for, the content or data collection, handling and storage practices of any of these third party websites. Nor does the provision of any links to those websites constitute an endorsement of these other websites, their content or their practices. We do not have any control over any cookies or any tracking technologies they may apply.

This Privacy Policy does not apply to third party websites. These other websites are subject to their own privacy and any of their other related policies, if any.

Information storage, destruction & security

nQueue Billback LLC is committed to take all reasonable steps to protect your information, including from misuse, interference and loss and unauthorised access, modification and disclosure.

We require all our employees, contractors and agents to agree to obligations of confidentiality with respect to information collected, handled or held by us or on our behalf.

Information received by us or on our behalf, from clients or users of our products is treated in accordance with these obligations of confidentiality and the terms of this Privacy Policy.

We use electronic customer management and database systems to store most of the information. Some of the customer management and database systems are web-based. Some of these systems may be provided by third party service providers. Our databases and systems are accessed by authorised users and contain security features to ensure the protection and integrity of the data that we hold.

Customer data created using our products is stored on our servers which are kept in secure data centres owned by third parties but managed, administered and controlled by nQueue Billback LLC.

We generally return or destroy or de-identify data which has been provided to use for technical support or consulting purposes. Some data, once de-identified, may be kept for training or QA purpose so that we may continue to develop and improve our products and processes.

Some of your information (supplied when you signed up for the products) may also be in stored in the above secure data centres in Australia and the United Kingdom.

Access to information and complaints

If you would like:

- i. details of the information which we may hold about you; or,
- ii. to correct any of the information that we hold;
- iii. to complain about a breach of any legislation relating to personal data, please contact us as follows:

nQueue Billback LLC

7890 S. Hardy Drive Suite 105

Tempe, AZ 85284

Tel: 866-206-5285

Support: 866-206-5285

virtualcabinetusa@reckon.com

We have internal procedures in place to deal with such requests, and we may require further information from you to verify your identity. Generally, we will correct or give access to your information where it is reasonable and practicable to do so. If nQueue Billback LLC refuses to correct, or grant access to the information we will provide written notice to you of its decision and reasons for the decision.

General

Should you have any queries in relation to this Privacy Policy or to issues generally surrounding the information that we hold about you, please contact the Privacy Officer at the relevant address referred to below.

From time to time, this statement may be amended. An up-to-date version of the Privacy Statement will always appear on this page. If we make any material changes we will notify you by means of a notice on this page or notify you by email, at our discretion. We

encourage you to periodically review this page for the latest information on our Privacy Policy.

Furthermore, you may request a copy of this statement from the address or phone number or email address referred to above.

Last updated May 2016