

OXYGEN FINANCE®
Privacy Policy
(Revised 9 February, 2017)

Oxygen Finance Ltd. (a UK Company), its subsidiaries and affiliates (“Oxygen,” “our,” “us,” or “we”) respects your privacy. In that regard, we have created this Privacy Policy to let you know what information we collect, why we collect it and how it is used. We collect certain information when you use our the Oxygen network and our related services (referred to collectively as the “Oxygen Network”) whether in your individual capacity as a participating supplier or customer on the Oxygen Network or through your company’s role as a participating supplier or customer on the Oxygen Network, and whether through the www.oxygen-finance.com website or any sub-domain name available to one of our suppliers or customers as an employee or independent contractor of such party (collectively, the “Website”), our smart phone applications (each an “Application”) or such other features, websites or applications offered from time to time. By using the Oxygen Network, you consent to the data practices prescribed in this Privacy Policy.

What information does Oxygen collect?

“**Personal Information**” means any information that may be used to identify an individual, including, but not limited to, first and last name, employment information and social security number, home or work address, email address and password, phone number, or other contact information, whether at work or at home, age information, bank account and routing information and credit card or other payment information. This definition does not supersede any legal definitions contained in any applicable federal, state, foreign or other law. We may ask you to provide Personal Information that will enable us to enhance your use of the Oxygen Network, or for purposes such as facilitating correspondence with you or your company, registering your entitlement to access certain special features, or to complete transactions or for reporting to taxing and other governmental authorities if or in case such reporting obligations may be applicable. It is always your choice whether or not to provide that Personal Information. If you choose not to provide requested Personal Information, you may not be able to use certain, and in some cases any, of the features of the Oxygen Network.

Technical Information. We may collect and use technical data and related information, including but not limited to technical information about your device, system and application software, peripherals and your interactions with the Website and the Oxygen Network (“**Technical Information**”). Technical Information is gathered periodically to provide product and service updates, product support, product enhancements and other services to you (if any) related to the Website and the Oxygen Network. We may also automatically receive and record information on our server logs from your browser or mobile device, which could include your IP address, cookie information, browser information and the page you request. We do not consider this information to constitute Personal Information and while we will not use it in a way that associates such information with you, we may aggregate and use such information. Oxygen owns this information and may use it in any manner it deems appropriate.

Location Based Information. You also acknowledge and agree that we may collect location-based data from you or your device through the Oxygen Network (“**Location-Based Information**”).

Do Not Track. We may collect information from your web browser about your activities over time and across third-party websites, applications or other online services (including through embedded features such as buttons or widgets). Your web browser may allow you to opt-out of our collection of this information by selecting a “do not track” (or similar) setting. However, we do not currently have processes to address those settings or other “do not track” requests, and consequently, cannot guarantee that it will honor such requests. If you do not want us to collect this information, do not use the Website.

How does Oxygen use this Information?

Except as otherwise set forth herein or in our Oxygen Network Supplier Terms of Use, customer agreement or other agreement with you or your company, Personal Information, Technical Information and Location-Based Information (collectively, “**Information**”) that you provide or that we collect will be kept confidential and used to support the participation by you and your company on the Oxygen Network, to communicate with you regarding the account you and your company have with us and to inform you of other participants on the Oxygen Network and the features and functionality we may from time to time offer related to the Oxygen Network.

Oxygen may use your Information, as long as it is in a form that does not personally identify you – other than as permitted under “Sharing of Information” below – to improve, market or promote Oxygen’s products and services (including the Oxygen Network) and your participation on the Oxygen Network.

You own all right, title, and interest in and to any information that you submit to Oxygen in order to use the Website (“**Your Information**”). You grant Oxygen a perpetual, non-exclusive, transferable, sublicensable, royalty-free license to use Your Information in order to collect, develop, create, extract or otherwise generate statistics and other information and to otherwise compile, synthesise and analyse Your Information (“**Anonymised Data**”). Notwithstanding anything herein to the contrary, to the extent that Oxygen collects or generates Anonymised Data, such Anonymised Data will be owned solely by Oxygen and may be used for any lawful business purpose without a duty of accounting to you or your company, provided that such data is not personally identifiable and does not identify you or your company as the source of such data.

Sharing of Information

Except as set forth herein and for certain Information that Oxygen provides to your company, Oxygen does not rent, sell or share Information with or to third parties, and Information is only used to provide you with access to and facilitate your use of the Oxygen Network and to comply with any requirements of law. As part of that use, you agree that we may identify you or your company, as applicable, as a participating supplier or customer on the Oxygen Network to other participating suppliers and customers and to prospective suppliers and customers.

Agents, technology vendors and/or contractors of Oxygen may have access to your Information on a need to know basis for the purpose of performing services on behalf of Oxygen or providing or enabling elements of the Oxygen Network. All such agents or contractors who have access to such information are required, by non-disclosure agreements, to keep the Information confidential and not use it for any other purpose than to carry out the services they are performing for Oxygen or as otherwise required by law.

Oxygen or its agents or contractors may disclose Information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process; (2) protect and defend the rights or property of Oxygen or its agents or contractors; or (3) act in urgent circumstances to protect the personal safety of users of the Oxygen Network or the public.

Finally, if Oxygen should ever merge with another organisation, file for bankruptcy, or sell our assets or capital stock, we may transfer the Information to a third party or share the Information to the company or its agents with which we enter into such transaction as a part of such transaction.

Security of Your Information

We maintain physical, electronic, and procedural safeguards designed to protect the Information.

Despite the actions and precautions we take, no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of the Information and you acknowledge and agree that you transmit it to us at your own risk.

Please keep in mind that whenever you voluntarily disclose Information on our message boards or other public forums or features or through e-mail or group messaging, or voluntarily utilise features of the Oxygen Network that inherently share Information, that Information can be collected and used by others, including your company. In short, by posting Information online that is publicly accessible (i.e. within message boards and the like), you may receive unsolicited messages from other parties in return or make others aware of your location. We are not responsible for the security or privacy of any Information you choose to submit in connection with these public features.

You acknowledge that certain information or content that you provide in connection with the Oxygen Network may inherently allow or help third parties to personally identify or locate you.

Third-Party Websites, Services and Technologies

We may provide links to third-party websites on the Website or in other communications to you. Such links may appear as a specific domain name or URL or may be activated by clicking on an advertisement or other icon or graphic. Please be aware that other websites and services, including the websites of third parties that you connect with through the Oxygen Network, may collect personally identifiable information about you. This Privacy Policy does not cover the information practices of those third-party websites, services or applications and cannot control and are not responsible for the information collection practices of any such websites, services or applications. We encourage you to carefully review the terms of use, privacy policies, and any other legal notifications on such websites before using or providing information through such websites, services or applications. Further, our Oxygen Network may employ third party technologies that require you to accept such third party's terms. This Privacy Policy does not cover the information practices of those third-party technologies.

International Transfers

Information collected through the Website may be stored and processed in the United States or any other country in which Oxygen or its affiliates, subsidiaries, agents or contractors maintain facilities. If you are accessing the Website from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your data to the United States and processing globally. By providing your Information, you consent to any transfer and processing in accordance with this Privacy Policy.

Your Consent to this Privacy Policy

By using the Oxygen Network, you agree to this Privacy Policy. This is our entire and exclusive Privacy Policy and it supersedes any earlier version.

We may change this Privacy Policy by posting a new version of this Privacy Policy on the Website or through the Oxygen Network, and it is your responsibility to review this policy periodically. When we do change the policy, we will also revise the "last updated" date at the Privacy Policy and may notify you or post a message via the Application, on the Website and/or through the Oxygen Network. Your continued use of the Oxygen Network constitutes your agreement to this Privacy Policy and any updates.

Contacting Oxygen

For questions or comments regarding this Privacy Policy, or to request your information is removed from our systems, please contact us at support@oxygen-finance.com.