

Temenos Learning Community Privacy Policy **(Last revised on 25 May 2018)**

This Privacy Policy applies to the Temenos Learning Community (the "Portal") which is run by Temenos Headquarters SA ("Temenos"), a company registered in Switzerland under company number CH-660.0.327.994-5 and our registered office is at 2 Rue de L'École-de-Chimie, 1205 Geneva, Switzerland.

This Privacy Policy ("Policy") explains how Temenos collects, uses and discloses personal information about you when you visit the Portal and when you contact Temenos, whether by e-mail, post or telephone using the contact options on the Portal. When we do so we are regulated under applicable local data protection laws including in the European Union ("EU") the General Data Protection Regulation ("GDPR") where we are responsible as 'controller' of that personal information. We may also provide you with additional information at the time we collect your personal information where we feel it would be helpful to provide relevant and timely information. For information on how we collect and use personal information from your use of other Temenos websites or services please see our general privacy policy on www.temenos.com.

The information you provide to us through the Portal will initially be collected by Temenos but may then be shared with certain affiliates of Temenos and other suppliers (the "Partners"). All references to "Temenos", "we" and "our" in this Policy therefore include the Partners, unless distinguished in the text. Depending upon your relationship with Temenos, we may separately provide you with further details about our use of your personal information.

For the purposes of EU law, Temenos Headquarters SA is the data controller and has appointed Temenos UK Ltd (registered office 5th Floor, 71 Fenchurch Street, London EC3M 4TD) as its Article 27 Representative in the EU. We have appointed Bernhard Schneider, as Data Protection Officer for Germany Address: Datenschutzauditor (GDD/BvD), Leiter Fachbereich Datenschutz eMail: B.Schneider@gdb-beratung.de Tel.: 0221/912698-300 Fax: 0221/912698-370

What type of information does Temenos collect and why?

When you visit our Portal, we may automatically collect standard internet and website log information and details of patterns about how Portal visitors behave. The information we may collect includes information about your Internet service provider, your operating system, browser type, domain name, the Internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the Portal that referred you to us, the Web pages you request and the date and time of those requests. This may allow us to find out which parts of the Portal are popular or need changing.

Our collection of Portal use information may also involve the use of cookies and Web beacons. Please see our Cookies Policy for more information.

The Portal allows you to interact with Temenos and other users of the Portal in many ways, including creating a user account allowing you to create posts, interact more readily with available content, other users and carry out online training and examinations.

If you want to register an account with us you will need to provide us with some additional personal information so that we can ensure the information provided to you is relevant and to be certain that we are placing any new information you create as a user of the Portal in the appropriate category. If you do choose to create an account or otherwise to provide us with your personal information, we will collect that information for the purposes described in this Policy.

What type of personal information does Temenos collect?

Where you choose to provide personal details to us, we and our Partners may collect the following personal information from you:

- your full name;
- your mobile phone number;
- your landline phone number;
- your country of residence;
- your address;
- your date of birth;
- your place of birth;
- your nationality;
- your membership type;
- your professional e-mail address;
- your e-mail address and password;
- your credit/debit card details;
- your education
- your training record;
- your employer;
- your job title;
- results of any exams you have taken and any awards/certificates you receive;
- any information you voluntarily provide through your Portal account such as your posts in our online community or your check in to a location;
- your location when accessing the Portal;
- details of the sector in which you currently work;
- your CV should you choose to upload it;
- your contact and marketing preferences;
- if you take a survey or interact with us in various other ways - demographics information and information about subjects that may interest you;
- information you voluntarily submit to us (including through the Portal) from time to time as part of user generated content (or through other means);
- information necessary for legal compliance; and/or
- information you choose to share with the Portal through your LinkedIn, Facebook, Twitter account (or other social media outlets where similarly accessed through the Portal).

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers, individuals who you have indicated have agreed for you to provide their personal information, government, tax or law enforcement agencies and other third parties. We may also collect personal information about you from your use of other Temenos websites or services.

How does Temenos use information about you?

Temenos may use information about you for purposes described in this Policy or as otherwise disclosed to you on our Portal or with our services. The lawful basis for which Temenos processes information about you is: (1) as required to meet our contractual obligations, or (2) as required by law, or (3) as is necessary for the exercise of Temenos' legitimate business interests and needs where our legitimate interests are not outweighed by your applicable data protection rights. In particular, we may use information about you for the following purposes:

- to respond and/or deal with your request or enquiry;
- to administer the Portal;
- for internal record keeping;
- to provide you with information at your request, or as a result of searches undertaken using the Portal;
- to request your feedback in relation to your use of the Portal
- to keep you informed about the Portal and the content and services and content provided from the Portal;
- to contact you by e-mail for any of the above reasons;

- subject to your consent, to carry out direct marketing and/or e-mail marketing that you have requested;
- where necessary as part of any restructuring of Temenos or sale of Temenos business or assets; and
- for compliance with legal, regulatory and other good governance obligations, including for sanction checking and money laundering compliance obligations.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal information that Temenos maintains will be kept in paper files, while other personal information will be included in computerised files and electronic databases.

Temenos may also convert personal information into anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to monitor and improve Portal performance.

Does Temenos share personal information with third parties?

Your personal information will only be made available for the purposes mentioned above (or as otherwise notified to you from time to time) to staff who properly need to know these details for their functions within Temenos. Please note that certain individuals who will see your personal information may not be based at Temenos or in your country (please see below).

We may share personal information within the Partners as needed for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding the expansion and promotion of the Portal and for use by those companies for the other purposes described in this Policy.

Your personal information may also be made available to third parties (within or outside Temenos) providing relevant services under contract to Temenos, or the Group (see below for further details), such as marketing agencies, auditors and compliance managers, suppliers of functionality used within the Portal and IT hosting and IT maintenance providers. These companies may use information about you to perform their functions on our behalf. Please contact us at tlc@temenos.com if you would like an up to date list of the Partners and these third parties.

Where you are subscribed to the Portal under a company subscription or subscription paid for by your employer, we may share reports with your company/employer which include information related to your use of the Portal and trainings undertaken, such as (a) which exams you have attempted (b) pass/fail rates (c) recommendations for classroom courses based on fail rates (d) progress on training course (e) membership levels on resources (e.g. associates, accredited etc.) and (f) learning path progress and certifications. We may provide access to these reports to your company/employer through an admin user section on the Portal. This information may also be shared with the team at Temenos which manages the relationship with your company/employer.

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and for tax or other purposes. Your personal information may also be made available to third parties or partners, where necessary, as part of any restructuring of Temenos or sale of Temenos's business or assets. Personal information may also be released to external parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and terms of use, or to protect the rights, property or safety of Temenos, our employees, agents, Portal users and others, as well as to parties to whom you authorise Temenos to release your personal information.

The Portal includes links to third party websites and some of your personal information from your browsing session may be transferred to such third party websites (please see our Cookies Policy for more information).

Temenos will not share your personal data with any third parties outside of the Group for marketing purposes.

Will your personal information be transferred abroad?

Some transfers of personal information to third party recipients have been explained above. Individuals within the European Economic Area ("EEA") and Switzerland should be aware that such recipients of their personal information (as set out in this notice), may not be located within the EEA or Switzerland but instead located in countries which do not have equivalent protection for personal information to that within the EEA or Switzerland. Steps will be taken to protect your personal information in that instance consistent with applicable law. Where information is transferred outside the EEA and Switzerland to a recipient in a country that is not subject to [an adequacy decision](#) by the EU Commission, your information will be adequately protected by the EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules (as permitted under the GDPR).

For individuals in the EEA, a copy of the relevant mechanism can be provided for your review on request to Temenos Headquarters SA, 2, Rue de L'Ecole-de-Chimie, 1205 Geneva, Switzerland or to tlc@temenos.com, marked for the attention of Corporate Legal.

What choices does Temenos offer you with regard to direct marketing?

Temenos may wish to provide you with information about new products, services, promotions and offers, which may be of interest to you. This communication may occur by e-mail. We will obtain your consent and advise you of how to opt-out of receiving such communications where we are required to do so in accordance with applicable law. You may opt-out of direct marketing activities by contacting us at tlc@temenos.com. You can also manage the communications and notifications you receive from us at any time by using the Notifications tool in the My settings section of your online profile within the Portal.

What safeguards are in place to protect your personal information?

We will use appropriate technical and organisational security measures which are designed to prevent personal information from being accidentally lost, or accessed or used in an unauthorised way. We limit access to your personal information to those who have a genuine business need to do so. Our personnel are subject to a duty of confidentiality and required to undertake training on how to handle personal information in an appropriate manner. Where we use third parties to provide services and process personal information on our behalf we require them to use personal information we share with them only in accordance with our instructions and not for other purposes.

We have a process for handling any suspected data security breach and will comply with any notification obligations in the event of a breach.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, you should be aware that the security of your information transmitted to and from you via the internet cannot be guaranteed and any such transmission by you is at your own risk.

Password Protection

Where we have given you or you have chosen a password or access code which enables you to access certain parts of our website, this will be unique to you and you are responsible for keeping this password confidential. If you are prompted to create or update your password, you should create a strong password and never share your login details with anyone. If you suspect your password may have been compromised you must tell us immediately by contacting us at tlc@temenos.com and change your password using the reset/forgotten password function.

What rights do you have to review and amend personal information?

You have the right to review your personal information held by Temenos and have certain inaccurate information about you corrected.

Where applicable, you may have additional rights under the GDPR or local legislation in the EEA including the right to ask us for a copy of see or update the personal information held about you as well as obtain supporting explanatory materials. You may ask us to make any necessary changes to your data ensure it is accurate and up to date or ask us to restrict the processing of the data transfer it to other organisations at your request in certain circumstances. You may also have rights to object to some processing and where we have asked for your consent to process your data, to withdraw your consent. Where we process your data because we have a legitimate interest in doing so, you may also have the right to object to this. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. Where applicable, you may have similar rights in your country under local legislation to access and correct/update your data.

If you wish to exercise any of your rights, please contact tlc@temenos.com, or write to us at Temenos, 2 Rue de L'Ecole-de-Chimie, 1205 Geneva, Switzerland marked for the attention of Corporate Legal.

How to complain

We hope that we can satisfy queries you may have about the way we process your information. If you have any concerns, you can get in touch with Temenos, 2, Rue de L'Ecole-de-Chimie, 1205 Geneva, Switzerland, marked for the attention of Corporate Legal or for individuals in Germany, you can contact the local Data Protection Officer: Bernhard Schneider, Datenschutzauditor (GDD/BvD), Leiter Fachbereich Datenschutz eMail: B.Schneider@gdb-beratung.de Tel.: 0221/912698-374 Fax: 0221/912698-370

If you have unresolved concerns, you may also complain to the relevant supervisory authority (if applicable) in the country where you work, normally live or where any alleged infringement of data protection laws occurred

Retention of your personal information

We will keep your details on record for so long as you have a registered account with Temenos. If you would like to close or delete your registered account, please do get in touch using the contact details above.

Temenos may keep your details on record for as long as is necessary for the purposes set out above and will then endeavour to delete your details in accordance with data protection and other applicable legislation. To the extent permitted or required under applicable law, after termination of your account, Temenos may retain your personal information for an appropriate period to comply with its legal obligations, meet regulatory requirements or to protect itself from legal claims.

Changes to this Policy

We keep this Policy under regular review. We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. The date at the top of this Policy will be updated accordingly.

We encourage you to check the date of this Policy when you visit the Portal for any updates or changes. We will notify you of any modified versions of this Policy that might materially affect the way we use or disclose your personal information.

This Policy only extends to the Portal and does not, therefore, extend to your use of, provision of data to and/or collection of data on any website not connected to us to which you may link by using the hypertext links within this Portal.

Contact/address details

If you have any questions about this Policy, please contact us at:
tlc@temenos.com, or write to us at Corporate Legal, Temenos, 2 Rue de L'Ecole-de-Chimie,
1205 Geneva, Switzerland