



The term “personal data” includes any information that enables you to be identified, such as your name, physical address, e-mail address and phone number.

1. Nature of the Data Collected and Purpose of the Data Processing When You Access this Web Site

ABACAS™ collects the IP address of the computer you are using to browse the site. If this address is a “static” or fixed IP address, ABACAS™ could in certain circumstances theoretically be able to identify you, and therefore, this type of information could be considered personal data. However, ABACAS™ only collects this type of information to compile usage statistics on an anonymous basis and to validate the origin of the “subscriber”; ABACAS™ does not collect IP address data to identify you. Apart from your IP address, no personal data is transmitted when accessing this Web site. Unless you submit personal data about yourself by filling in a form on the Web site or by sending us an e-mail, we will not maintain any other personal data as a result of your access and usage of the site. The Web site invites you to register with us on-line, by providing information through a form page. We may use the information you submit by registering to send you customized marketing information by post, on-line download or e-mail. You may request to cease receiving such information at any time following registration. You may request to be removed from our e-mail list by sending an email to techsupport@abacasexchange.com with the word UNSUBSCRIBE in the email subject line or by following the unsubscribe instructions at the bottom of the email. You may request to be removed from our postal mailing list by sending an e-mail message to techsupport@abacasexchange.com or by sending a letter to:

ABACAS™ Attn: Privacy Policy email address info@abacasexchange.com

The site may also require you to register to enjoy certain services and privileges provided through the site, such as on-line reporting, support or education. The information provided in the context of registering for these services is collected to respond to your inquiry, process an order, to provide you with access to specific account information or to enable us to provide you the aforementioned on-line services securely through password protection. In addition, in order to better understand the needs of the visitors of this Web site and to adapt the Web site to these needs, we occasionally conduct on-line surveys and perform “anonymous peer analysis”. Participation in the surveys is optional. The data collected through these surveys is used for statistical analysis of visitors and subscribers, ABACAS™ product assessments and for direct marketing purposes.

2. Disclosure of Personal Data

Unless we tell you otherwise, we do not sell or rent your personal data to any third parties. When involved in a joint marketing partnership, ABACAS™ may share information which you have submitted to us with the partner company which is subject to applicable non-disclosure obligations.

3. Use of “Cookies”



ABACAS™ uses cookies to: (i) facilitate customer use of our website, (ii) enable customization of our online services and website features, (iii) avoid customer re-entry of data, (iv) store customer preferences for certain kinds of information, and (v) gather data about usage of our website for research and promotions. Cookies stored on customers' web browsers by ABACAS™ cannot be read by, and are not shared with, any third parties. This Web site sends “cookies” to your computer to better serve you with more tailored information when you return to the website. A cookie is a small element of data that can be sent by our web site to your browser and stored on your hard drive, not on ABACAS™ web site. Cookies do not collect information about visitors. Unless you input your Personal Data onto our website you cannot be identified and remain anonymous. You can set most browsers to tell you when you are sent a cookie and to refuse to receive it.

For further information about cookies and how to disable them please go to: aboutcookies.org

4. Transfer of Your Data to Other Entities Belonging to the Group of ABACAS™ Companies and to Third Parties

ABACAS™ may disclose your personal data to other entities belonging to the ABACAS™ group of companies and to third parties to the extent that such disclosure is not incompatible with the purposes for which the personal data is collected as mentioned above. ABACAS™ complies with EU Anti Spam Legislation, by ensuring that you are notified of the option to opt-in to receive emails and always include opt-out instructions in all marketing emails.

5. Security of Your Data

At ABACAS™, we realize that top-of-the-line security is of the utmost concern when dealing with sensitive information. We also recognize that in using our service, you trust us with the most important information and documents you own – we understand the significance of your commitment.

ABACAS™ takes all reasonable precautions including stress testing using ethical hacking to adequately prevent others from freely accessing the information you provide or that we compile. In all cases, we exceed the standards as set out in the Data Protection Act 1988, the General Data Protection Regulation, and the Processing of Personal Data Regulations. Account details are encrypted with bank-level security including AES-256 encryption with a uniquely-derived key for each user following the recommendations of the National Institute of Standards and Technology to ensure your security. Despite these precautions and although such unauthorized access is highly unlikely, we feel obligated to inform you of the risk and advise you that ABACAS™ is not liable for any damages caused by such unauthorized access. We do however perform our security functions with the utmost of care.

Bank-level security means that your important personal information is encrypted and protected using the same industry-leading technology that banks use. For more details about both our operational practices and commitment to security, please keep reading.

Securing Your Data at Rest

Within our systems, all your data is stored using AES-256 encryption with a uniquely derived key for each user following the recommendations of NIST 800 Series Special Publications.



We encrypt every single personally identifiable field in the database, including your name and email address. For searching and indexing, we hash a small number of fields using HMAC. We apply the same encryption technique to all files you upload.

As with all systems such as ours, the security of your information depends on you. You must choose a strong password (we enforce this as best we can) and you should never share your password with anyone. To supplement your security, ABACAS™ uses 2FA (two factor authentication).

Securing Your Data in Transit

All communications between you and ABACAS™ are encrypted via SSL using 2048-bit certificates and we require SSL on all communications. We are implementing perfect forward secrecy so that even if someone eavesdrops on your communication, they will still not be able to decrypt the data in the event that our key is compromised.

Operational Procedures to Keep the Site Secure

ABACAS™ follows best practices to keep your data secure. In addition to severely restricting access to operational environments (including private keys), we regularly audit our environments and code for security issues and apply patches expeditiously. We use commercial services that regularly check our site and we also retain our own security experts to probe and verify the security of our site.

Administrative Access to Your Information

Because your security and privacy is paramount to us, we limit what access our administrators have to your account to the limited set of data necessary to help grant you access to your account (by triggering confirmation emails, for example) and help you restrict access to your account in urgent circumstances (such as by limiting or removing access). ABACAS™ administrators can never see any documents that you upload. They may have access to limited meta-data (such as the general classification of the upload) but not the data itself (they will never be able to see the content). ABACAS™ logs and regularly audits and records all accesses to your account.

6. Third Party Sites

This policy only addresses our activities from our servers. Other sites (including those that we link to within an advertisement banner or otherwise, and third party sites or services which we cobrand) may have their own policies, which we do not control, and thus are not addressed by this policy.

7. Your Right to Access, Correction, and Deletion

You have the right to ask ABACAS™ about the information we hold about you. In addition, you have the right to correct or delete any information we hold about you subject to regulatory and compliance requirements and restrictions. If you wish to know which information ABACAS™ holds about you or if you wish to correct and update this



information, please contact us at: info@abacasexchange.com . ABACAS™ endeavors to honor your request within four weeks of receipt. If you want us to delete your private data and unsubscribe you from any mailing list or email list in the future, we will attend to your demand within four weeks of receiving your email. In addition, if you have registered on www.abacasexchange.com, you may log onto such site and, using your password, update your profile. If you wish to opt out of future marketing communications, please follow the instructions at the bottom of the message received or email us at techsupport@abacasexchange.com

8. **Accessibility**

You have the right of protection under the guidelines of the Equality Act 2010 or British Standard 8878. Abacas has constructed its website in accordance with this legislation.

9. **Changes to the Privacy Policy**

This policy may be amended at any time, so please check back periodically. Privacy policy last updated: March 28, 2018.