ABGI Ireland Privacy & Cookies Policy

Privacy Policy

ABGi Ireland Privacy & Cookies Policy (last updated June 2nd, 2021)

1. Who we are

ABGI IRELAND LIMITED, registered in Ireland under company number 506246 whose registered address is Dogpatch Labs, The CHQ Building, Custom House Quay, Dublin 1, D01 Y6h7 and our Affiliates ("ABGi", "we", "us" or "our") are committed to protecting and respecting your privacy.

We are a member of a group of tax recovery consultants and tax credit advisory businesses and we provide tax credit advisory services and other related services and products to our clients (the "Service").

Your privacy is important to us and we are committed to protecting and safeguarding your data privacy rights.

This privacy and cookies policy (the "Policy") applies to the Service and our websites, including www.abgi-ie.com, domains and applications and services related thereto (the "Sites"). This Policy is designed to protect you, our users, by informing you what Personal Data (as defined below) is collected or provided to us, how we will use the information about you, with whom we share it, how long we keep it, how we protect it, and how to contact us if you have any queries or concerns about our use of your Personal Data or if you wish to exercise your rights as described below under 'How to contact us' at Section 16 below.

In this Policy, the term "Personal Data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes personal data as described in Data Protection Law (as defined below).

We will handle your Personal Data in accordance with Data Protection Law. "Data Protection Law" means the Data Protection Acts 1988 to 2018, the General Data Protection Regulation (EU) 2016/679 ("GDPR"), and any other applicable law or regulation relating to the processing of Personal Data and to privacy, including the E-Privacy Directive 2002/58/EC and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, including any supplements, revisions replacements of such legislation from time to time.

We are the controller (as defined in Data Protection Law) in relation to any Personal Data relating to you, either directly or indirectly, through your or any other user's use of our Service or our Sites. This Policy sets out the basis on which any such Personal Data will be processed by us. You may be a data subject (as defined in Data Protection Law) or you may be a controller. When you are a controller in respect of the Personal Data of other data subjects, then you must comply with all of your controller obligations under Data Protection Law. When you are a controller, we and you act as independent controllers, unless agreed otherwise.

Please read this Policy carefully. Using our Sites or the Service indicates that you have reviewed this Policy and have agreed to be bound by it. If you do not agree to this Policy you must leave our Sites immediately.

2. Who this Policy applies to

We collect and process the information regarding the following categories of people in connection with our Service and via our Sites:

- Clients who are prospective and live client contacts;
- Contacts who are prospective and placed contacts for introducer agreements and sales meetings and attendees of events we host or organise;
- Suppliers who are contacts that support our Business;
- Candidates who include prospective employees, subcontractors, consultants, temporary workers for recruitment or engagement by us;
- Client employees who include their employees, subcontractors, consultants and temporary workers of our clients; and
- Users of our Sites.

3. How we obtain Personal Data

We fully respect your right to privacy in relation to your interactions with the Service and endeavour to be transparent in our dealings with you as to what information we will collect and how we will use your information. Also, we only collect and use individual's information where we are legally entitled to do so. Information in relation to Personal Data collected by Irish entities is available on www.dataprotection.ie, the website of the Irish Data Protection Commission.

We may collect Personal Data from or about you in the course of providing the Service or your use of the Sites, which includes:

Categories of information

Basic identity information such as your first and last name (including prefix or title)

Contact information such as your billing, business and home postal address, email address and fax a

Occupational information including your job titles, work history, education history, qualifications, pro-

Occupational information such as salary and employment benefits, professional training history and

Financial information including your VAT and other tax reference numbers, bank account or card deta

Social networking information from your professional profiles available in the public domain such as

Newsletter information which is information provided by you when you opt-in to receive our newslette

Technical information such as information from your visits to our Sites or applications (including inte application information, language preference, operating system and application version, device type referral source, length of visit, page views and website navigation paths and other technology on the and communications we send to you electronically

Location data relating to you including, but not limited to, traffic data, location data, how you use and our website is most popular, web blogs, other communication data and the resources that you access

Any other information relating to you which, for example, you may provide to us such feedback, repoinformation sent to us in other documents, information that you provide about yourself when negotia

4. Information we obtain from other sources

We may obtain your Personal Data from other sources such as LinkedIn, corporate websites, third party market research, online and offline media, relevant external events, business cards and personal recommendations.

We work closely with other third parties including other group companies, our clients, other suppliers and other agencies who may be acting on your behalf and from whom we may receive Personal Data about you from them in connection with our Service.

If you provide Personal Data to us about any person other than yourself, you should ensure that you have a legal basis for doing so and that you have complied with your obligations under Data Protection Law. You should also try to limit the Personal Data you give us to what you think is necessary in order for us to provide you with our Service.

5. Why we hold Personal Data and how we use it?

In order to provide our Service to you via our Sites or otherwise, we need to process Personal Data. We will only process Personal Data that is necessary for the purposes of providing the Services and the Sites in accordance with this Policy, unless such processing conflicts with Data Protection Law or other applicable Irish law, in which case, the applicable law will prevail.

Please note that not all purposes set out below will apply to you all of the time. Our purposes for processing Personal Data include:

- Providing our Service and our Sites.
- Paying clients, suppliers and employees.
- Communicating with you.
- Quality, audit and risk management reviews.
- Maintaining and using IT systems.
- For marketing purposes, with your permission.
- Compliance with legal obligations.

Where we wish to use your Personal Data in any other way, we will ensure that we notify you and get your consent first. You will be given the opportunity to withhold or withdraw your consent for the use of your Personal Data for purposes other than those listed in this Policy.

6. Our lawful basis for processing your Personal Data

We may use Your Personal Data on any one or more of the following legal bases:

- to perform contractual and pre-contractual business and employment relationships.
- for our legitimate business purposes in providing the Service to you (in which case, our legitimate interests will not override your fundamental data protection and privacy rights) which are:
 - Providing, managing, operating and improving the performance of our Sites and Services.
 - Paying clients, suppliers and employees.
 - · Promotion of our Service.
 - Responding to enquiries, send service notices and provide client support.
 - Sharing Personal Data with third party service providers that provide services on our behalf and business partners which help us operate and improve our business;
 - Ensuring network and information security and maintenance.
 - Transmitting Personal Data within our Affiliates for internal administrative purposes.
 - Crime and fraud prevention.
 - For client service, customer satisfaction, product analysis and market research purposes
 - Helping us establish, exercise or defend legal claims.
 - to comply with a legal obligation; and/or
- where you have given us your consent.

Please note that we may process your Personal Data for more than one legal basis depending on the specific purpose for which we are using the Personal Data. Please contact us if you need details about the specific legal basis we are relying on to process Your Personal Data.

7. Withdrawal of consent

If you no longer consent to our processing of your Personal Data (in respect of any matter referred to in this Policy as requiring your consent), you may request that we cease such processing by contacting us via 'How to contact us' at Section 16 below. Please note that if you withdraw your consent to such processing, it may not be possible for us to provide all/part of the Service to you.

8. Who do we share Personal Data with?

ABGi Ireland is part of a global organisation and therefore Personal Data we collect from you may be transferred, stored or accessed from outside the European Economic Area ("EEA") to the overseas companies in the ABGi group for the purposes of us providing the Service. Such transfers will occur where they are necessary for providing the Service and where the transfer is authorised by Data Protection Law. Your Personal Data may also be processed outside the EEA by our suppliers.

We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy and Data Protection Law. The safeguards in place with regard to the transfer of your Personal Data outside of the EEA to third parties includes the entry by us into appropriate data processing agreements and data transfer mechanisms as required under Data Protection Law.

We restrict access to your Personal Data to our employees, contractors, consultants and agents who need such access in order to operate, develop, or improve our Service. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, civil litigation and/or criminal prosecution, if they fail to meet these obligations. We may also share your Personal Data with our third party suppliers who assist us in the provision of the Service.

In order to fulfil our legal and other obligations and in connection with our rights including protection of our legitimate interests, we may disclose Personal Data to law enforcement agencies, regulatory bodies, credit reference agencies, government agencies and other third parties as required by law or for crime prevention, protection against fraud, credit risk reduction or for administrative purposes (for example, Revenue Commissioners) and only to the extent permitted by Data Protection Law.

If we become involved in a merger, acquisition, or any form of sale of some of all of its assets, Your Personal Data will not be transferred to any third party unless there are adequate safeguards in place with the recipient in respect of the security of your Personal Data.

9. Third party websites

This Policy applies to the Sites that are owned and operated by us. We do not exercise control over the sites/applications that may be linked from the Sites. You may see 'social buttons' during your use of the Sites, including but not limited to Twitter and LinkedIn which enable you to share or bookmark certain web pages. These websites and social platforms have their own cookies and privacy practices, which are controlled by them.

This Policy does not apply to third party websites, products, or services, even if they link to the Sites. Please refer to the privacy notices or policies of those third parties for further information on how your personal information is processed. Please be aware that we are not responsible for the privacy practices of any third parties.

You acknowledge that the Service that we provide may enable or assist you to access the Sites' content of, correspond with, and purchase goods and services from, third parties via third party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your Personal Data.

10. How we store and protect Personal Data

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your Personal Data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your Personal Data transmitted, stored or otherwise processed.

ABGi Ireland holds Personal Data in a combination of secure online and offline computer storage facilities, and paper-based files. All information that you provide to us in physical form such as documents will be stored securely at our offices or at a secure storage facility. All information you provide to us electronically is stored on our secure servers.

All information you provide to us or that is provided to us is stored on our secure server or on the secure servers of our Affiliate or its third party are protected to ensure that unauthorised or unlawful processing of Personal Data, accidental loss or destruction of, or damage to, Personal Data does not occur. Where we

have given you (or where you have chosen) a password or personal identification number (PIN) which enables you to access any part of our Service, you are responsible for keeping this password confidential. We ask you not to share a password with any person not authorised to use the Service.

Where required by law, we put in place legal mechanisms designed to ensure adequate data protection of your Personal Data. We also require our third-party suppliers to guarantee the same level of protection as provided by ourselves, in accordance with Data Protection Law. Please note that our third-party suppliers have confirmed they hold Personal Data in a combination of secure online and offline computer storage facilities and any paper-based files are stored securely at their offices.

Unfortunately, the transmission of information via post, email or the internet is not completely safe and secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of Personal Data sent to us by any of these means and any information sent to us in this way is at your own risk. Once we have received Personal Data, we will use strict procedures and security features to try to prevent unauthorised access and require our third party suppliers to do the same.

To the extent permitted by law, we are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that our Service may be subject to limitations, delays and other problems inherent in the use of such communications facilities. We cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of your Personal Data arising from such risks.

11. Breach reporting

We will notify serious data breaches in respect of your Personal Data to the Data Protection Commission without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay. However, it is not necessary to notify the Data Protection Commission where the Personal Data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A Personal Data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including their effects and the remedial action taken, and will notify you of any data breach affecting your Personal Data (which poses a high risk to you) when we are required to do so

under Data Protection Law. We will not be required to notify you of a Personal Data breach where:

- we have implemented appropriate technical and organisational measures that render your Personal Data unintelligible to anyone not authorised to access it, such as encryption; or
- we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- it would involve disproportionate effort, in which case we may make a public communication instead.

12. How long do we hold Personal Data for?

Your Personal Data will be kept and stored for such period of time as we deem necessary taking into account the purpose for which it was collected in the first instance. This may include retaining your Personal Data as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Service.

Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Service, not to specifically analyse personal characteristics about you.

We will use reasonable endeavours to ensure that Personal Data is maintained and up to date. We may also contact you from time to time to check that the information is still correct and we will update or delete your Personal Data accordingly.

13. Your rights under Data Protection Law

As a data subject, you have the following rights under Data Protection Law and we, as controller in respect of your Personal Data, will comply with such rights in respect of your Personal Data:

- the right of access to your Personal Data;
- the right to correct any mistakes in your Personal Data;
- the right to ask us to stop contacting you with direct marketing;
- the right to restrict or prevent your Personal Data being processed;
- the right to have your Personal Data ported to another data controller;
- the right to erasure; and
- the right to complain to the Data Protection Commission if you believe we have not handled your Personal Data in accordance with Data Protection Law.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your Personal Data, please contact us (see 'How to contact us' at Section 16 below). We will respond to any rights that you exercise within one month of receiving your request, unless the request is

particularly complex in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

• Right of access to your Personal Data

You may ask to see what Personal Data we hold about you and be provided with:

- a summary of such Personal Data and the categories of Personal Data held (see Sections 3 and 4 above);
- details of the purpose for which it is being or is to be processed (see Section 5 above);
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are outside the European Economic Area and what safeguards are in place for those transfers outside the European Economic Area (see Section 8 above);
- details of the period for which it is held or the criteria we use to determine how long it is held (see Section 12 above);
- details of your rights, including the rights to rectification, erasure, restriction or objection to the processing (set out in this Section 13);
- any information available about the source of that data (see Sections 3 and 4 above); and
- whether or not we carry out automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision making or profiling (see Section 13.4 below).

Details in respect of the above points are all set out in this Policy; however, if you need further clarification, please contact us (see 'How to contact us' at Section 16 below).

Requests for your Personal Data must be made to us (see 'How to contact us' at Section 16 below) specifying what Personal Data you need access to, and a copy of such request may be kept by us for our legitimate purposes in managing the Service. To help us find the information easily, please give us as much information as possible about the type of information you would like to see. If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.

We are also entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the Personal Data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to Data Protection Law.

 Right to update your Personal Data or correct any mistakes in your Personal Data

You can require us to correct any mistakes in your Personal Data which we hold free of charge. If you would like to do this, please:

- email or write to us (see 'How to contact us' at Section 16 below);
- let us have enough information to identify you (e.g. name, registration details); and
- let us know the information that is incorrect and what it should be replaced with.

If we are required to update your Personal Data, we will inform recipients to whom that Personal Data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.

It is your responsibility that all of the Personal Data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see 'How to contact us' at Section 16 below)

Right to ask us to stop contacting you with direct marketing

We have a legitimate interest to send you electronic communications in connection with the Service and related matters (which may include but shall not be limited to newsletters, announcement of new features etc and which may also appear on social media platforms such as Facebook, LinkedIn, Twitter or Instagram). We may also ask you for your consent to send you direct marketing from time to time. We may also ask you different questions for different services, including competitions. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

You have the right to withdraw consent to marketing at any time by contacting us (see 'How to contact us' at Section 16 below). You also have the right to object where we are processing your personal data for direct marketing purposes.

We will provide you with information on action taken on a request to stop direct marketing – this may be in the form of a response email confirming that you have 'unsubscribed'. Unsubscribing from direct marketing does not unsubscribe you from essential electronic communications in respect of the provision of our Service to you.

Rights in relation to automated decision making

We do not attempt to collect further data without user consent that enables personally identifiable profiling of our users.

Right to restrict or prevent processing of your Personal Data

In accordance with Data Processing Law, you may request that we stop processing your Personal Data temporarily if:

- you do not think that your Personal Data is accurate (but we may start processing again once we have checked and confirmed that it is accurate);
- the processing is unlawful but you do not want us to erase your Personal Data;
- we no longer need the Personal Data for our processing; or
- you have objected to processing because you believe that your interests should override the basis upon which we process your Personal Data.

If you exercise your right to restrict us from processing your Personal Data, we will continue to process the Personal Data if:

- you consent to such processing;
- the processing is necessary for the exercise or defence of legal claims;
- the processing is necessary for the protection of the rights of other individuals or legal persons; or
- the processing is necessary for public interest reasons.
- Right to data portability

In accordance with Data Protection Law, you may ask for an electronic copy of your Personal Data that you have provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to Personal Data that you have provided to us – it does not extend to data generated by us. In addition, the right to data portability also only applies where:

- the processing is based on your consent or for the performance of a contract; and
- the processing is carried out by automated means.
- Right to erasure

In accordance with Data Protection Law, you can ask us (please see 'How to contact us' at Section 16 below) to erase your Personal Data where:

- we do not need your Personal Data in order to process it for the purposes set out in this Policy;
- if you had given us consent to process your Personal Data, you withdraw that consent and we cannot otherwise legally process your Personal Data;
- you object to our processing and we do not have any legal basis for continuing to process your Personal Data;
- your Personal Data has been processed unlawfully or have not been erased when it should have been; or
- the Personal Data have to be erased to comply with law.

We may continue to process your Personal Data in certain circumstances in accordance with Data Protection Law. Where you have requested the erasure of your Personal Data, we will inform recipients to whom that Personal Data have

been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.

Right to complain to the Data Protection Commission

If you do not think that we have processed your Personal Data in accordance with this Policy, please contact us in the first instance (see 'How to contact us' at Section 16 below). If you are not satisfied, you can complain to the Data Protection Commission or exercise any of your other rights pursuant to Data Protection Law. Information about how to do this is available on the Data Protection Commission website at www.dataprotection.ie.

14. Cookies

Our Sites use cookies to distinguish you from other users of our Sites. This helps us to provide you with a better experience when you browse our Sites and also allows us to improve our site. They also help us to improve our Service and to deliver many of the functions that make your browser experience more user-friendly. A cookie is a small text file that is placed on your device by a web server 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 types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Sites. They include, for example, cookies that enable you to log into secure areas of our Site, use a shopping cart or make use of e-billing services.
- Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Sites work, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to allow us to personalise our content for you by remembering your preferences such as providing the Site in a different language or remember if we have already asked you for feedback or to complete a survey.
- **Social media cookies.** These cookies are set by a range of social media services, such as Twitter and LinkedIn, that we have added to the Site to enable you to share our content with your friends and networks.

They are capable of tracking your browser across other sites and building up a profile of your interests. This may impact the content and messages you see on other websites you visit. If you do not allow these cookies you may not be able to use or see these sharing tools.

You can find a list of first party cookies we use and the purposes for which we use them in the tables below.

Purpose	Description	Type & Expiry
Performance (i.e., User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).	Session, deleted upon closing the browser, or persistent.
Security Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session, deleted upon closing the browser, or persistent.
Site Preferences	Our cookies may also remember your site preferences. Seek to enhance your experience	Session, deleted upon closing the browser, or persistent.

Please note that a number of third parties may also use cookies. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies help us to improve our Service and to deliver many of the functions that make your browser experience more user-friendly.

You can find a list of third party cookies we use and the purposes for which we use them in the tables below.

Third party cookies

Provider	Cookie	Purpose	Duration
Google	Analytics	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	Two years
PHPSESSID	Necessary	This cookie is native to PHP applications. The cookie is used to store and identify a users' unique session ID for the purpose of managing user session on the website. The cookie is a session cookie and is deleted when all the browser windows are closed.	One year

cookielawinfo- checkbox- necessary	Necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".	One year
cookielawinfo- checkbox- necessary	Necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Non-necessary".	One year
Google	Performance	This cookie is installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.	One minute

We use Google Analytics to obtain high-level "audience measurement" data such as the referral web domain, type of operating system/browser used, date and time of visit, and other information relating to activities on our Site to understand its usage better, analyse trends, and optimise the Site experience. To opt out of being tracked by Google Analytics across all websites, visit http://tools.google.com/dlpage/gaoptout.

The 'Help Menu' on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

For more information about cookies and managing them including how to turn them off, please visit www.cookiecentral.com. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to fully experience the interactive features of our Sites.

You can review and change your consent status of each cookie category (except strictly necessary cookies) by clicking on the 'C' icon at the bottom left of the website.

15. Changes to this Policy

We may update this Policy from time to time at our sole discretion. The date of the most recent revisions will appear on the top of this Policy. If you do not agree to these changes, please do not continue to use the Service to submit your Personal Data. If material changes are made to the Policy, we will notify you by placing a prominent notice on our Sites or by sending you a notification in relation to this. We will not process your Personal Data in a manner not contemplated by this Policy without your consent.

16. How to contact us

If you need to contact us with regard to any of your rights as set out in this Policy, all such requests should be made in writing by email to dpqueries@abgi-ie.com

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement.