

Qwil Messenger Privacy Policy

The practices described in this privacy policy statement are current as of date 30 July 2025

Overview – the key information you should be aware of

(A) **Who we are:** We are Network Platform Technologies Limited, provider of the Qwil Messenger service. Our company number is 10651016 and our registered office is 5 St John's Lane, London, England, EC1M 4BH. All references in this policy to "**Qwil Messenger**", "**our**", "**us**" or "**we**" refer to Network Platform Technologies Limited. All references in this policy to "our website" are a reference to the website owned by Qwil Messenger at www.qwilmessenger.com and all references to "our service" are a reference to the Qwil Messenger service.

(B) **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information. We also want you to know *your rights* in relation to your information which you can find in section 6.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in section 12.

(C) **Who this policy applies to:** This policy applies to:

1. End users of the Qwil Messenger service (Section 2.1);
2. Visitors to our website (Section 2.2);
3. Personnel at our customers (Section 2.3);
4. Personnel at prospective customers (Section 2.4);
5. People who contact us with enquiries (Section 2.5); and
6. Our suppliers and employees of our suppliers (Section 2.6);

Depending on our relationship, we will collect and use your information in different ways. Please read the sections outlined above to find out the information that we collect about you and how we use this information.

(D) **What this policy contains:** This privacy policy describes the following important topics relating to your information:

1. How we obtain your personal information (Section 1);
2. Collection of your personal information and how we use it (Section 2);
3. Our legal basis for using your personal information (Section 3);
4. How and why we share your personal information (Section 4);
5. How long we store your personal information (Section 5);
6. Your rights (Section 6);
7. Marketing (Section 7);
8. Where we may transfer your personal information (Section 8);
9. Risks and how we keep your personal information secure (Section 9);
10. Links to other websites (Section 10);
11. Changes to this privacy policy (Section 11); and

12. Further questions and how to make a complaint (Section 12).

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 6. Two of the fundamental rights to be aware of are that you may:

1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in section 6.

(F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

The detail – the key information you should be aware of

1. How we obtain your personal information

- 1.1 You may provide us with your personal information voluntarily, for instance, when you register as a user of the Qwil Messenger service and fill in your user profile.
- 1.2 You may give us personal information about yourself by using the online forms provided on our website or contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive information or services from us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.
- 1.3 We also receive information about you from third parties such our clients, partners, suppliers or via websites which you visit, which we refer to as "third party sources" or "suppliers" throughout this policy.

2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

2.1 End users of the Qwil Messenger service

(a) What personal information we collect about you

We, or third parties on our behalf, collect and use any of the following information about you:

- (i) your email address;
- (ii) your mobile phone number;
- (iii) your password
- (iv) your device information (including IMEI number, operating system and jailbreak detection status);
- (v) your IP address;
- (vi) login attempt information;
- (vii) version of the Qwil Messenger software being used; and
- (viii) version of this privacy policy which you have accepted.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to verify who you are when you access the Qwil Messenger service and establish a connection to the authorised tenant in a specific location (in other words, to the business who invited you to use the Qwil Messenger service).

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

Please note that we only act as 'data controller' of the personal information stated above for the limited purposes stated above (unless our relationship with you is such that another part of this section 2 applies). We act as 'data processor' for our corporate customers (in other words your employer or the business which invited you to use the Qwil Messenger service). As such, any personal information which you provide or which we obtain via the Qwil Messenger service (which may go beyond the personal data listed above, including any personal information sent in chats on the service) will be used by Qwil Messenger on behalf of, and on the instructions of, our corporate customers for additional purposes. For example, personal data relating to your user profile, usage statistics, the content of your chats and documents which you send via Qwil Messenger will be saved on behalf of, and accessible by, the relevant data controller. Additionally, as part of the provision of the Qwil Messenger service to our corporate customers, your profile information (including your name, organisation and profile photo) will be published and viewable by other users of Qwil Messenger so that you can be found on the service by other users. Please refer to the privacy policies of the relevant business entity who invited you to use the Qwil Messenger service for details of how they use (or engage us to use) your personal data.

2.2 Visitors to our website

- (a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name;
- (ii) your email address;
- (iii) any updates to information provided to us;
- (iv) the following information created and recorded automatically when you visit our website:
 - (A) **Technical information.** This includes: the Internet protocol (IP) address used to connect your computer to the internet address; device ID; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages;
 - (B) **Information about your visit and your behaviour on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads; and
 - (C) **Cookie information.** Our website uses cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future,

by understanding and remembering your particular browsing preferences.

Where we use cookies on our website, you may block these at any time. To do so, you can activate 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 access all or parts of our website or to use all the functionality provided through our website.

For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy [here](#).

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access and use our website;
- (ii) to receive enquiries or requests from you through the website about our services;
- (iii) for improvement and maintenance of our website and to provide technical support for our website;
- (iv) to ensure the security of our website;
- (v) to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website according to your individual interests; and
- (vi) to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

2.3 Personnel at our customers

(a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number;
- (v) your employer; and
- (i) any other information provided when you correspond with us.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to provide you with our services;
- (ii) to deal with any enquiries or issues you have about our services that you request from us;
- (iii) to provide support for any faults or failures in our service or technologies;

- (iv) to send you certain communications (including by email or post) about our services such as service announcements and administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges);
- (v) to carry out statistical analysis and market research relating to our services; and
- (vi) if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

2.4 Prospective customers

- (c) We, or third parties on our behalf, may collect and use any of the following information about you:
 - (i) your name;
 - (ii) your postal address;
 - (iii) your email address;
 - (iv) your telephone number; and
 - (v) personal information we collect about you from third party sources such as your employer or your employer's company website or LinkedIn.
- (d) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

2.5 People who contact us with enquiries

- (e) We, or third parties on our behalf, may collect and use any of the following information about you:
 - (i) your name;
 - (ii) your postal address;
 - (iii) your email address;
 - (iv) your telephone number;
 - (v) information provided when you correspond with us; and
 - (vi) any updates to information provided to us.
- (f) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to deal with any enquiries or issues you have about our business and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. We may process your personal

information for these purposes where it is in our legitimate interests for client services purposes.

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

2.6 Our suppliers and employees of our suppliers

- (g) We, or third parties on our behalf, may collect and use any of the following information about you:
- (i) your name;
 - (ii) work contact information (phone number, postal address, mailing address, email address);
 - (iii) your job title;
 - (iv) information provided when you correspond with us; and
 - (v) any updates to information provided to us.
- (h) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits); and
- (ii) for background checks required by law.

Please see sections 2.7 and 2.8 for more details about how we use your personal information.

- (i) Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly-available sources, such as LinkedIn.

2.7 Whatever our relationship with you is, we also collect, use and store your personal information for the following additional reasons:

- (j) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (k) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- (l) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- (m) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.8 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 2. Please contact us using the details in section 12 if you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

3. Legal basis for use of your personal information

3.1 ***We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:***

- (n) our use of your personal information, including as set out at section 2.1 is necessary to perform our obligations under any contract with you (for example, to provide the Qwil Messenger service to you in accordance with the terms of use of the service, to comply with the terms of use of our website which you accept by browsing our website and/or to comply with any contract to provide services to or receive services from you or your employer);
- (o) our use of your personal information is necessary for complying with our legal obligations; and
- (p) where (a), (b) do not apply, our use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:
 - (i) to operate the Qwil Messenger service and our website;
 - (ii) run, grow and develop our business;
 - (iii) operate our website;
 - (iv) select appropriately skilled and qualified suppliers;
 - (v) marketing, market research and business development;
 - (vi) provide Qwil Messenger and associated services to our customers, make and receive payment and provide customer services; and
 - (vii) for internal administrative purposes.

We have carried out a balancing test and we believe that we have a legitimate business interest to use and share your personal data (in compliance with this privacy policy and subject to your various rights as set out in this privacy policy) for the purpose of providing our services and running our business. We do not deem this legitimate interest to be detrimental to you. You can ask us for information on this balancing test by using the contact details at section 12.

3.2 ***If we rely on your consent for us to use your personal information in a particular way, such as for use of Qwil Messenger Services as per our Terms and Conditions or direct marketing purposes, but you later change your mind, you may withdraw your consent by contacting us at legal@qwilmessenger.com and we will stop doing so. If you are using Qwil Messenger Service with an organisation, please withdraw your consent with them first directly.***

4. How and why we share your personal information with others

4.1 *We will share your personal information with the following third parties or categories of third parties where it is in our legitimate interests to do so:*

For end users of Qwil Messenger services as per clause 2.1

- (q) our service providers and sub-contractors, including hosting and cloud service providers for the use of the Qwil Messenger service as per clause 2.1 b)

For other data subjects, clause 2.2, 2.3, 2.4, 2.5, 2.6.

- (r) our service providers and sub-contractors, including but not limited to payment processors, identity verification providers, electronic contract signing, suppliers of technical and support services, insurers, and hosting and cloud service providers;
- (s) companies that assist us in our marketing, advertising and promotional activities;
- (t) analytics and search engine providers that assist us in the improvement and optimisation of our website; and

- (u) our customer relationship management software providers, including Salesforce, headquartered in the US, which store your personal data globally, in order to assist us in providing the Services and contacting you.

We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws. We will require any such third-party service provider to notify Qwil Messenger if they become unable to satisfy these privacy and security obligations, and we will take reasonable steps to stop and remediate unauthorised or non-compliant processing by any such third-party service provider upon becoming aware of such processing.

4.2 We will also disclose your personal information to third parties:

- (v) where it is in our legitimate interests to do so to run, grow and develop our business:
 - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - (ii) if substantially all of Qwil Messenger's or any of its affiliates' assets are acquired by a third party, in which case personal information held by Qwil Messenger will be one of the transferred assets;
- (w) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (x) in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (y) to protect the rights, property, or safety of Qwil Messenger, our staff, our clients or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

4.3 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to other third parties, and for our marketing and promotion purposes.

4.4 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent.

If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

4.5 Qwil Messenger uses push notifications as part of its services.

These allow you to receive a notification of a new message, even if your device is in standby or the Qwil Messenger app is closed. Push notifications are delivered by service providers like Apple, Google or Microsoft. As such, an anonymized and encrypted identifier relating to your device used by the service provider so that you receive these notifications. To the best of our knowledge, this data is used solely to deliver a particular push notification to you. However, please note that Qwil Messenger has no influence or control over the usage of this data by your device's service provider, including the countries to which it is transmitted. If you do not want to receive push notifications or do not want to send content in push notifications, this can be configured on your device.

5. **How long we store your personal information**

5.1 ***We keep your personal information for no longer than necessary for the purposes for which the personal information is processed.*** The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

5.2 **In particular, if you are an end user of the Qwil Messenger service, we retain your personal data for such time as you are a subscriber.**

6. **Your rights**

6.1 **You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at legal@qwilmessenger.com at any time. You have the following rights:**

- (a) Right of access. You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").
- (b) Right to update your information. You have a right to request an update to any of your personal information which is out of date or incorrect.
- (c) Right delete your information. You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at the email address above.
- (d) We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are by contacting us at the email address above.
- (e) Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at the email address above.
- (f) Right to stop marketing: You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- (g) Right to data portability: You have a right to ask us to provide your personal information to a third party provider of services.
- (h) This right only applies where we use your personal information on the basis of your consent or performance of a contract, and where our use of your information is carried out by automated means.
- (i) Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

6.2 **We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.**

6.3 **If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.**

7. Marketing

- 7.1 We may collect and use your personal information for undertaking marketing by email telephone and post.
- 7.2 We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.
- 7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.
- 7.4 If you wish to stop receiving marketing communications, you can contact us by email at legal@qwilmessenger.com.

8. Where we may transfer your personal information

- 8.1 Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us or our suppliers, including in Australia, Canada, USA, China, Singapore, Japan, South Korea, Hong Kong, India and Brazil. Further details on to whom your personal information may be disclosed are set out in section 4.
- 8.2 If we provide any personal information about you to any such non-EEA members supplier, client or partner, we will take appropriate measures, in accordance with Article 45 and 46 of the General Data Protection Regulation, to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. This may include entering into European Commission approved standard contractual arrangements with them.
- 8.3 Further details on the steps we take to protect your personal information, in these cases, is available from us on request by contacting us by email at legal@qwilmessenger.com at any time.

9. Risks and how we keep your personal information secure

- 9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private. For this reason, Qwil Messenger is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.
- 9.2 Your personal information will be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.
- 9.3 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or

liability for the content of such third party websites or third party terms and conditions or policies.

11. Children

You must be at least 18 years of age to use Qwil Messenger. Our services are not directed to individuals under 18 and we do not knowingly collect personal information from individuals under the age of 18. If we learn that we have collected personal information of an individual under the age of 18, we will take steps to delete such information.

12. Changes to our privacy policy

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

13. Further questions and how to make a complaint

13.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact legal@qwilmessenger.com. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

13.2 You may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.