

UK Privacy Policy for Customers and Contacts May 2018

V1.0

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1. What is the purpose of this document?

AURES Technologies Limited (company number: 04570946) ("**we, our, us**") along with all other members of the AURES group companies (the "**Group**") are committed to protecting the privacy and security of our customers' and contacts' personal information.

This privacy policy describes how we collect and use personal information about our customers and contacts, in accordance with the General Data Protection Regulation (EU) 2016/679 – the "**GDPR**".

It applies to all our customers and contacts.

AURES Technologies Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about our customers and contacts ("**you**", "**your**"). We are required under data protection legislation to notify you of the information contained in this privacy policy.

It is important that you read this notice, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- Contact details such as name, title, addresses, telephone numbers and email addresses.
- Payment history.

- Contractual agreements past and present.
- Information about our customers' use of our information and communications systems.
- Cookie information to distinguish you from other customers/users of our website.

4. How is your personal information collected?

We typically collect personal information about you when you purchase products and/or services from us including via our website, email or telephone. We may sometimes collect additional information from third parties including credit reference agencies or other background/identity check agencies. We may also collect additional personal information throughout the period of us supplying products and/or services to you or your organisation including when you register to use our website, subscribe to our services, search for a product or sign up for our promotions.

5. How we will use information about you

We will use your personal information as follows:

- To administer or otherwise carry out our obligations arising from any contracts entered into with you/your organisation or to take steps to enter into any contracts between you/your organisation and us.
- To provide you with the information, products and services that you request from us and to provide customer service.
- To fulfil any requests, you have made or orders placed, or to contact you with information relevant to your interaction with us.

Our lawful basis for these activities above is necessity to perform our contract of sale with you/your organisation.

- To notify you about changes to our services.
- For our business purposes, including data analysis, developing new products, enhancing, improving or modifying our services, identifying usage trends and determining the effectiveness of our promotional campaigns.
- To allow you to participate in interactive features of our services, when you choose to do so.
- To provide you with a good experience when you browse our website and also allow us to improve our site and services and to ensure that content from our services is presented in the most effective manner.
- To provide you with information about other products and services we offer that are similar to those that may have already been purchased or enquired about.

- To ascertain your ability to pay us for the products and/or services we may provide to you.
- For our audit purposes.
- For fraud monitoring and prevention.

Our lawful basis for these activities above is the pursuit of our legitimate interests of operating and expanding our business activities lawfully.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of our customers' personal information.

6. If a customer fails to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or your organisation (such as providing the products and/or services to you).

7. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. Automated decision-making required or permitted by law

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about our customers or contacts using automated means, however we will notify you in writing if this position changes.

9. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the Group, which include France, Germany, Australia and USA.

We require third parties to respect the security of our customers' data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might we share your personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process your personal information?

"Third parties" includes third-party service providers (including contractors, designated agents and our auditors) and other entities within our Group, including our finance and supplier teams. The following activities are carried out by third party service providers: processing and storage of customer emails, IT support, which can involve third party support staff, logging in to our internal systems with full administration rights. For example, our service and maintenance providers, our CRM system, accounts package and external marketing support.

How secure is your information with third-party service providers and other entities in our Group?

All our third-party service providers and other entities in the Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might we share your personal information with other entities in the Group?

We will share your personal information with other entities in our Group as part of our regular reporting activities on company performance, in the context of a business reorganisation or Group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law – potential recipients include HM Revenue & Customs.

Transferring information outside the EU

We may transfer the personal information we collect about customers to the following countries outside the EU (Australia and USA) in order to perform our contract with you. There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information. However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure: no information will be shared outside of the AURES Group of companies, who in turn will be subject to group policy. If you require further information about these protective measures, you can request it from gdpr-uk@ares.com.

10. Data security

We have put in place measures to protect the security of your information. Details of these measures may be obtained from emailing gdpr-uk@ares.com.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent our customers' and contacts' personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Data retention

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of personal information we process are available in our **Data Retention Policy** which is available from gdpr-uk@ares.com.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer or contact of ours, we will retain and securely destroy your personal information in accordance with our **Data Retention Policy**.

12. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact gdpr-uk@ares.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact gdpr-uk@ares.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

13. Changes to this Privacy Policy

Kerry Braithwaite has been appointed to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact gdpr-uk@ares.com.

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.