## **Privacy Statement – ERA Ltd**



### Introduction

ERA Ltd (registered as European Raid Arrays Ltd) ("we", "us", or "our") are strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities, please go to the relevant sections of this statement.

#### Security

We take the security of all the data we hold very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

## When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

In common with other professional service providers, we use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the country where we and our clients are located. This includes countries outside the European Union ("EU") and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses. The European Commission approved standard contractual clauses are available <u>here</u>.

Personal data held by us may be transferred to:

i) Third party organisations that provide applications/functionality, data processing or IT services to us.

We use third parties to support us in providing our services and to help provide, run and manage our systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are in secure data centres around the world, and personal data may be stored in any one of them.

ii) Third party organisations that otherwise assist us in providing goods, services or information

iii) Auditors and other professional advisers

iv) Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## Changes to this privacy statement

We recognise that transparency is an ongoing responsibility, so we will keep this privacy statement under regular review.

This privacy statement was last updated on 14 May 2018.

# Data controller and contact information

The data controller is ERA Ltd (the limited company registered in England under registration no. 03680211 and with its registration address at European Raid Arrays Ltd, 23A Chess Business Park, Moor Road, Chesham, Buckinghamshire HP5 1SD)

If you have any questions about this privacy statement or how and why we process personal data, please contact us at the above addresses or via email at <u>sales@eraltduk.com</u> using Privacy Statement as the subject.

Phone: +44 (0)207 607 4224

## Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and include further information about the rights that individuals have and how to exercise them below.

Access to personal data:

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at <u>sales@eraltduk.com</u>. We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (currently 40 days).

Amendment of personal data:

To update personal data submitted to us, you may email us at <u>sales@eraltduk.com</u> or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which you registered. When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

## Withdrawal of consent:

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please email us at <u>sales@eraltduk.com</u> to stop receiving an email from an ERA Ltd marketing list, please click on the unsubscribe link in the relevant email received from us.

## Other data subject rights:

This privacy statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. Some of these rights will only be available from 25 May 2018.

If you wish to exercise any of these rights, please send an email to sales@eraltduk.com.

## Complaints:

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to <u>sales@eraltduk.com</u>. We will look into and respond to any complaints we receive. You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the <u>ICO website</u>.