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GROUP

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## EAMS GROUP PRIVACY NOTICE

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## VERSION HISTORY

| Version | Date       | Changed by    | Comments  |
|---------|------------|---------------|---|
| 1.0     | 11/04/2018 | P Matemachani | Draft   |
| 1.2     | 24/04/2018 | W Gardner     | Revisions following initial policy review                               |
| 1.3     | 18/11/2016 | D Higgitt     | Information Security Manager Revisions following internal policy review |
| 1.4     | 18/05/2018 | R Carew       | Revisions following internal policy review                              |
|         |            |               |   |
|         |            |               |   |
|         |            |               |   |

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## APPROVALS

The signatures below certify that this management system manual has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

|             | Name          | Signature | Position                           | Date     |
|-------------|---------------|-----------|------------------------------------|----------|
| Prepared by | P Matemachani |           | Information security Administrator | May 2018 |
| Approved by | Robert Carew  |           | Data Protection Officer            | May 2018 |

## AMENDMENT RECORD

This management system manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

| Page No. | Context                            | Revision | Date       |
|----------|------------------------------------|----------|------------|
| All      | Formatting & finalisation of draft | 1.1      | 10/05/2018 |
| All      | Minor formatting & corrections     | 1.2      | 15/05/2018 |
| All      | Policy revisions and approval      | 1.4      | 18/15/2018 |
|          |                                    |          |            |
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## DOCUMENT CONTROL

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## 1. INTRODUCTION

EAMS Group is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR). Our company is registered with the Information Commissioners Office (ICO) and complies with the Data Protection Act 1998 and with the data protection principles set out in the Act.

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain. The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulation (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain. EAMS Group is pleased to provide the following GDPR information:

## 2. WHO ARE WE?

EAMS Group enables digital transformation for asset intensive industries by supplying software solutions tailored to suit organisations. More details of our solutions and our core values can be found here : <https://www.eams-group.com/about-eams-group/mission-vision-values/>

## 3. PERSONAL DATA?

The GDPR defines **personal data** as the following:

‘Any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;’

Personal data can include: name, job title, date of birth, passport data, home address, home telephone number, email address, emergency contact etc.

‘**Special categories**’ of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

## 4. COLLECTION OF INFORMATION

We may collect personal information from you if you provide it voluntarily.

If you do provide personal information to use, we will assume that you have read this Policy and have consented to us using your personal information in the ways described in this Policy and at the point where you give us your personal information.

If, after providing us with personal information, you later decide that you do not want us to use it for particular purposes, then please write to us at the appropriate address.

## 5. HOW WILL YOUR INFORMATION BE USED?

In the course of our dealing with you we may collect and process certain information about you, including your name, date of birth, address, contact details (including your email address and contact telephone number), payment details (where applicable), any benefits you receive or are entitled to (including disability benefits) (where applicable), and other information about you and your property in respect of which services and products may be provided.

Your personal information may be used by us, our employees, contractors or agents to:

- identify you during any communication between you and us;
- assess eligibility for services and products (whether provided by us or on our behalf);
- communicate with you to arrange the provision of such services and products;
- administer and provide such services and products;
- detect and prevent loss, fraud and other criminal activity;
- carry out credit reference checks;
- carry out market research and to help us review, develop and improve the services and products we offer to organisations
- contact you (in accordance with your preferences), by post, telephone, SMS, email and other electronic means with information about products, services, promotions, and offers that may be of interest to you.
- In the event that we sell or buy any business or assets, we may disclose personal information held by us to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party, personal information held by us will be one of the transferred assets.

Your personal information may also be used by us, our employees or sub-processors if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce any agreement we have with or otherwise concerning you, or to protect our rights, property or safety or those of our customers, employees or other third parties.

## 6. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In connection with the above purposes, your personal information may be transferred to, or otherwise processed by third party service providers acting on our behalf, our sub-processors and law enforcement authorities (including the police).

EAMS Group uses the personal data/information collected from you to contact you, via telephone, email, written communication, conduct lawful security checks if required and to email you information which the organisation believes may be of interest to you depending on your relationship with EAMS Group.

Should a contract not exist with EAMS Group we will require your consent to EAMS Group using your information in the manner stated above until you either opt out or enter into contractual agreement with EAMS Group.

EAMS Group also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, EAMS Group will be acting on the instruction of its' client and will work hard to ensure that the clients data is handled in compliance with GDPR.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses.

EAMS Group may use such information to identify its visitors. EAMS Group may also collect statistics about the behaviour of visitors to its website. does not currently make use of cookies but if any changes are made in future to necessitate the use of cookies, the following guidelines will be adhered to. When we use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. This will assist EAMS Group identify and track visitors and their website access preferences. EAMS Group website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using EAMS Group's website.

Any information EAMS Group holds about you and your business encompasses all the details we have obtained about you from you or from your organisation through contracts, our own suppliers and public domain. EAMS Group will only collect the information needed so that it can provide you with information in relation to your relationship and contract if any (such as work email address). EAMS Group does not sell or broker your data.

## 7. CONSENT

Through agreeing to this privacy notice and continuing to use our website, solutions and services you are consenting to EAMS Group processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [information.security@eams-group.com](mailto:information.security@eams-group.com) or by phoning +44 (0) 20 3882 8448 or writing to us, see last section for full contact details.

We will not transfer your personal information outside the EU without first obtaining your consent.

## 8. DISCLOSURE

Should EAMS Group on occasion pass your Personal Information to third parties exclusively to process work on its behalf. EAMS Group requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. EAMS Group does not broker or pass on information gained from your engagement with our organisation without your consent.

However, EAMS Group may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of EAMS Group, its clients and/or the wider community.

We may occasionally change the Privacy Policy to reflect customer and company feedback. Any changes will be shown on this page.

## 9. RETENTION POLICY

EAMS Group will process personal data during the duration of any contract and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted. Some data may be kept longer as stipulated in the Data Controller Records.

## 10. DATA STORAGE

Data is held in the EU and USA territories through GDPR compliant suppliers. Some data is stored in the USA on secure AWS servers which have a data centre that is securely managed and EAMS Group has verified GDPR compliance. EAMS Group does not store personal data outside of these areas.



## 11. YOUR RIGHTS AS A DATA SUBJECT

You have the right to ask for a copy of the personal information held about you. You also have the right to ask for inaccuracies in information to be corrected. A copy of the information held about you by us can be requested by writing to us at the address shown.

At any point whilst EAMS Group is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that EAMS Group refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

EAMS Group at your request can confirm what information it holds about you and how it is processed.

## 12. YOU CAN REQUEST THE FOLLOWING INFORMATION:

- Identity and the contact details of the person or organisation (EAMS Group) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of EAMS group or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### 13. TO ACCESS WHAT PERSONAL DATA IS HELD, IDENTIFICATION WILL BE REQUIRED

EAMS Group will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If EAMS Group is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to [information.security@eams-group.com](mailto:information.security@eams-group.com) or by calling +44 (0) 1423 867264 or writing to us at the address further below.

### 14. COMPLAINTS

We aim to comply fully with our obligations. If a customer has any questions or concerns regarding EAMS Group management of personal data including their right to access data about themselves, then they should contact the Data Protection Officer who is responsible for ensuring our company is compliant with the data protection regulations.

If our company holds inaccurate information, then the customer should write to us at the address shown providing the director with any evidence to show what the information should say keeping copies of the correspondence. If after a reasonable amount of time (30 days is recommended) the information has not been corrected, then the customer can make a complaint.

In the event that you wish to make a complaint about how your personal data is being processed by EAMS Group or its partners, you have the right to complain to EAMS Group Data Protection Officer. If you do not get a response within 30 days, you can complain to the ICO. The Information Commissioner's Office is an independent body upholding information rights.

The details for each of these contacts are:

**The Data Protection Officer**

who can be contacted through [information.security@eams-group.com](mailto:information.security@eams-group.com)

**EAMS Group,**

Level 17,

25 Canada Square,

Canary Wharf, London, E14 5LQ

**ICO**

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>