

## Privacy statement

Your company has provided us with limited personal information described in this statement in order for us to provide you with the Esprit<sup>3</sup> reporting system. This privacy policy tells you how we use personal information to deliver this service. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis.

### Collection of Information

In order to provide you with Esprit<sup>3</sup>, your company has provided CSL with your name, company email address, your IP address and some identifiers relating to your position within your organisation.

We also monitor, collect and analyse usage statistics on an aggregated basis, to enable us to monitor and improve the service going forward.

### How we use your data

The information you provide is used to identify you within the software, and to enable us to ensure you see the information that is relevant to you, and to enable you to perform certain tasks within the software, such as resetting passwords and exporting masked data.

We also use these data from time to time to inform you about important events relating to the service, for instance when we will be conducting maintenance.

### Legal basis for processing your data

CSL process your data on behalf of your company in accordance with our contractual requirements with your company.

### Data retention

We will store your data for the period of your organisation's subscription, and will remove your personal data from our systems within 3 months of your organisations cancellation of the subscription.

### Your rights

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us using the Privacy Contact Information below.

If you no longer wish to receive information such as newsletters from us, you can unsubscribe by emailing “unsubscribe” to [info@csl-uk.com](mailto:info@csl-uk.com) from the relevant email address.

#### How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so, being sure to name the service it is regarding (e.g Esprit).

If you withdraw your consent, we will not be able to continue to provide you with the service once your data has been erased and therefore it may not be possible to comply with your request unless authorised to do so by your company.

#### How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us using the Privacy Contact Information below.

You also have the right to complain to the Information Commissioner’s Office. Find out on their website how to report a concern, <https://ico.org.uk/>.

#### Cookie/Tracking Technology

The software may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the usage of reports, and understanding how customer use the dashboards. Personal information cannot be collected via cookies and other tracking technology. Aggregate cookie and tracking information may be shared with third parties.

#### Categories of data processed

We only require “identifying data” to ensure you are entitled to see the data according to the sharing rules set out by your company. This is typically your name and business email address.

#### Location of processing

All data is stored and processed within the UK.

#### Distribution of Information

Your personal information is not shared with any other organisations, except in the following circumstances.

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorised transactions; or, (3) investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

Other users of the Esprit<sup>3</sup> system within your organisation will be able to see your name to identify the reports and specifications that you have created.

## Commitment to Data Security

Your personally identifiable information is kept secure. Only authorised employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information.

We take data security very seriously, and are ISO27001 certified.

## Privacy Contact Information

If you have any questions, concerns, or comments about our privacy policy you may contact us (the data controller) using the information below:

By email: [info@csl-uk.com](mailto:info@csl-uk.com)

By Phone: ++44 (0) 1483 528 300

By Mail: Data Protection Officer, CSL, The Sussex Barn, Peper Harow Park, Godalming, Surrey, GU8 6BQ

We reserve the right to make changes to this policy. Any changes to this policy will be posted.

**Last reviewed 22<sup>nd</sup> June 2021**