

INTRODUCTION

Ebeni (ICO Registration Z2038288) takes your privacy very seriously, and is the data controller for the information you provide unless otherwise stated.

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protective Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25th May 2018) and applicable national law. If you have any queries about how we handle your information please contact us at privacy@ebeni.com.

WHAT INFORMATION DO WE ASK FOR, AND WHY?

We collect and process personal data about you when you interact with us.

The personal data we process may include (but is not limited to):

- Your name, business postal, email address, and/or phone numbers; private contact information only if necessary
- Your job title, department, and dealings with Ebeni
- Information related to the browser or device you use to access our website;
- IP addresses
- And any other information you provide.

In addition, to comply with legal and regulatory obligations, to protect Ebeni's assets and employees/contractors and to ensure that Ebeni can comply with trade control, bribery and corruption laws and other regulatory requirements, additional screening of company officers may be undertaken using publically available sources.

WHAT IS THE SOURCE OF THIS INFORMATION?

We obtain this information directly from you, our personnel, through our systems and equipment, and where appropriate, background checking companies.

HOW DO WE USE THE INFORMATION YOU PROVIDE TO US?

Ebeni will use the personal data listed above for the following purposes:

- As required to establish and fulfil a contract with you. For example, if you make a purchase from us or enter into an agreement to provide or receive goods or services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it.
- To comply with applicable law and regulation.
- In accordance with our legitimate interests in protecting Ebeni's legitimate business interests and legal rights, including but not limited to use in connection with legal



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claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).

- In accordance with our legitimate interests to respond to any comments or complaints we may receive from you, including to investigate any complaints received from you or from others, about our services.

We may also contact you in relation to relevant products and services which may be of interest to you. Electronic direct marketing will only be sent when you have given your consent to receive it. You will be able to opt-out of electronic direct marketing at any time by following the instructions of the relevant communication.

DATA SHARING – why we may share your personal data with others

Ebeni may share your personal data with:

- Our professional advisors such as our auditors and external legal and financial advisors
- Our suppliers, business partners and sub-contractors where there is a business need to know

We will not share any of the information you provide with any third parties for marketing purposes.

Personal data may also be shared with government authorities and /or law enforcement officials if required by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of Ebeni for the purposes described above.

HOW LONG WILL WE KEEP THE INFORMATION WHICH YOU PROVIDE TO US?

We will not keep your personal information for longer than is necessary and will only retain the personal information that is necessary to fulfil the purpose for which it was collected. We are required to retain certain information by law, or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

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

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

WHERE IS MY DATA STORED, AND HOW SECURE IS IT?

The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. We have put in place appropriate security measures to prevent your personal information from unauthorised access, use or disclosure. 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.

The personal data that we collect from you may be transferred to and stored outside the European Economic Area. It may also be processed by staff operating outside the EEA who work

for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

LEGAL RIGHTS – in relation to your personal information

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

Under certain circumstances, you are entitled to:

- Request access to your personal information;
- Request the correction or erasure of your personal information;
- Object to the processing of your personal information;
- Request a restriction of processing of your personal information; and
- Request the transfer of your personal information to you or to a third party.

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

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

HOW CAN I FIND OUT MORE ABOUT EBENI'S HANDLING OF MY DATA?

Ebeni (ICO Registration Z2038288) takes your privacy very seriously, and is the data controller for the information you provide. If you have any concerns as to how your data is processed you can contact the Data Protection Advisor by writing to: The Data Protection Advisor, Ebeni Ltd, Hartham Park, Corsham, Wiltshire SN13 0RP, or by email to privacy@ebeni.com.

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>.

Date of Last Review: May 2018

Next Review Due: May 2019