

# Aura Air Limited - Privacy Policy - Version 1.0 - 1/3/2021

## Privacy Policy

### Policy Statement

Please read this Privacy Policy carefully as it describes Aura Air's collection, use, disclosure, retention and protection of your personal information. This Policy applies to any website, application or service which references this Privacy Policy.

### 1. About this Policy

Aura Air's takes the privacy of its customers and our customers' customers very seriously and is committed to protecting personal information. This Privacy Policy sets out the way in which any personal information you may provide to us (or provided to us by a company that utilises our services) is used and kept secure by Aura Air. It applies whenever we collect your personal data (including when you use our website), so please read it carefully. This policy does not apply to our employees.

This policy does not form part of any Aura Air Employee's contract of employment and may be amended at any time.

### 2. Definitions

#### Information

Means information or data (including critical business information) which is stored electronically, on a computer or authorised device (such as mobile phones), or in paper-based filing systems / locations.

#### Personal Data

Means any data relating to an identified or identifiable living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address, date of birth, identification number, location data), or it can be an opinion about that person, their actions and behaviour.

#### Data Protection Legislation

Means the General Data Protection Regulations (EU) 2016/679 ("GDPR"), unless and until GDPR is no longer directly applicable in the UK, the GDPR and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then any successor legislation to the GDPR or the Data Protection Act 1998.

#### Data Subjects

Means all the identified or identifiable living individual to whom the personal data relates. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

Data Subject Rights

Means the Data Subjects rights to be informed of the data being held about them, have access to the data (known as a Subject Access Request), ability to be able to rectify the data, to be forgotten – have that data erased, to restrict processing of the data (the data can be stored but not processed), to be able to have the data transfer easily between IT environments (portability), to be able to object to certain processing aspects (such as marketing), as well as rights relating to automated decision making and profiling.

### **Processing**

Means any activity that involves the use of the data. It includes collection, recording, structuring or storage of the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Data to third parties.

### **Cookies**

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to “remember” your actions or preferences over time. Most Internet browsers support cookies; however, users can set their browsers to decline certain types of cookies or specific cookies. Further, users can delete cookies at any time.

## **3. About Aura Air Limited**

### **Who we are**

This Privacy Policy applies to all products and services offered by Aura Air Limited (a company incorporated in England with company registration number **12391327**) whose registered office address is LEARS House, Chiltern Close, Bushey, Hertfordshire WD23 4PZ.

### **If you have any questions**

If you have any questions about this privacy notice, please contact our Data Protection Officer (DPO) by email – [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

## **4. Information we collect**

### **What information do we collect and why?**

We collect different information depending on what your relationship is with us, the products or services you use, or your contracts with us. We need to tell you what we use your information for and the legal grounds we have to use this information.

In broad terms, we use your data for the following purposes:

- to administer and provide products and services for our customers and to provide potential customers with information about services they have expressed an interest
- to administer and provide products and services for our customers’ customers
- to perform services that we are contracted to deliver
- for fraud screening and prevention purposes
- for record keeping purposes e.g. financial records
- to track your activity on our websites
- where you have a legitimate interest, for marketing purposes

When you interact with our website, we may also automatically collect the following information about your visit. This is primarily to help us better understand how our website visitors use our digital platforms to inform our marketing, enable us to create a better user experience or content and create more relevant communications:

- how you have reached our website or digital platform and the IP (internet protocol) address used
- your browser type, versions and plug-ins, and your operating system
- your journey through our website, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information which may enhance user experience.

## 5. How we use your data

### Customers

What information is collected	What is it used for	What is the legal basis for processing the data
<ul style="list-style-type: none"> <li>• Customer contacts</li> <li>• Invoicing details</li> <li>• Details of products we have sold you</li> </ul>	<ul style="list-style-type: none"> <li>• To provide contracted products or services to the Customer.</li> <li>• To provide you with consumables for your product.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a Contract. To allow us to complete the performance of our contract with you, we require you to provide the stated information (or access to the information).</li> <li>• We will send you marketing information that we think will be of interest to you as we consider this to be in your legitimate interest.</li> <li>• Where you opt in to receive Marketing from us, we will send you information about our products and services that we think will be of interest to you. The opt in will apply for three years, but you may unsubscribe at any point.</li> </ul>

## Prospective Customers

What information is collected	What is it used for	What is the legal basis for processing the data
<ul style="list-style-type: none"> <li>Contact details provided by the prospective customer at the point and time of them making initial contact and making an enquiry. This might be in person, over the phone or via our website.</li> </ul>	<ul style="list-style-type: none"> <li>To respond to the enquiry and provide any information required to fulfil the initial query and any subsequent queries.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest. It is in the legitimate interests of a person or organisation enquiring that we are able to contact them to provide them with the information necessary to satisfy their enquiry.</li> <li>Where you opt in to receive Marketing from us, we will send you information about our products and services that we think will be of interest to you. The opt in will apply for three years, but you may unsubscribe at any point.</li> </ul>

## Our Customers' customers

What information is collected	What is it used for	What is the legal basis for processing the data
<ul style="list-style-type: none"> <li>Contact details i.e. name, address, telephone number, email address.</li> <li>Details of the product or service that our customer requires us to provide to you.</li> </ul>	<ul style="list-style-type: none"> <li>To provide contracted products or services to the Customer.</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a Contract. To allow us to complete the performance of our contract with you, we require you to provide the stated information (or access to the information).</li> </ul>

## Suppliers

What information is collected	What is it used for	What is the legal basis for processing the data
<ul style="list-style-type: none"><li>• Supplier contacts</li><li>• Invoicing details</li><li>• Service level agreements and capabilities.</li></ul>	<ul style="list-style-type: none"><li>• To be able to place work with and direct work to the supplier, to enable Aura Air to meet its contractual obligations with customers and provide the best possible service and experience to contacts at these customers.</li><li>• To be able to pay for services delivered by the supplier.</li></ul>	<ul style="list-style-type: none"><li>• Performance of a Contract. To allow us to complete the performance of our contract with our customer we require the supplier to provide the stated information (or access to the information).</li></ul>

## Monitoring

We may monitor or record telephone calls for training and evidence purposes and to improve the quality of services that we provide to you.

## Additional Information

We may collect additional information as we develop new systems and services. This policy will be updated with the details if this is the case as outlined in section 11 of this policy.

## 6. Cookies

### What cookies we use

We primarily use cookies on our website known as performance cookies. Aura Air do not use tracking cookies. In navigating our website, certain routes will take you to the website of our Parent Company which has its own Privacy Policy and cookies.

## Performance Cookies

Cookie Type	What personal information is collected	What is it used for	Further Information
<ul style="list-style-type: none"> <li>Google Analytics</li> </ul>	<ul style="list-style-type: none"> <li>No personal data is collected</li> </ul>	<ul style="list-style-type: none"> <li>To collect anonymous information about how visitors use our website and those of other businesses in our Group</li> <li>We use the information to compile analytical reports which help us improve our website/s</li> <li>The cookies collect information such as the number of visitors to our website, how they arrived there (e.g. directly from the internet or through linking from another website) and tracking which webpages they visited.</li> </ul>	<ul style="list-style-type: none"> <li>Persistent cookies</li> <li>Google privacy details can be found <a href="#">here</a></li> </ul>
<ul style="list-style-type: none"> <li>You Tube</li> </ul>	<ul style="list-style-type: none"> <li>IP address and location</li> </ul>	<ul style="list-style-type: none"> <li>We may embed YouTube videos onto our websites, YouTube will then track your usage of the video, how long you watch it for, your IP address and location.</li> </ul>	<ul style="list-style-type: none"> <li>Session cookies – BookCheck do not retain or use this information</li> <li>YouTube privacy details can be found <a href="#">here</a></li> </ul>

Of course, you can also visit our website without accepting cookies. If you do not want your computer to be recognised the next time you visit, you may also decline to use cookies by changing the settings in your browser to “decline cookies”.

The respective procedure can be found in the operating instructions of your respective browser. If you refuse the use of cookies, however, this may lead to restrictions in the use of some areas of our websites.

### **Social Media Plugins**

Our website uses so-called “social plugins”. Currently these are the plugins of the services Twitter, Google + and LinkedIn. We ourselves do not collect personal data by means of social plugins or their use. Only when you actively click on one of the social plugins, can data be transmitted to the service provider and stored there.

## **7. Sharing your information**

### **Who we share your data with**

To provide our services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf.

These may include for example, sub-contractors, despatch organisations, companies who assist us with our marketing, other suppliers. They only use the information to provide their services to us.

We only give them the information that they need. We always keep control of your data and our suppliers must act in accordance with our instructions.

In some circumstances, we may also have to disclose your personal information by law, because a court or the police or other law enforcement agency has requested it.

### **Criteria for sharing your data**

We only share your data with third parties if:

- They have a need to know the information for the purposes of providing the contracted services;
- Sharing your Personal Data complies with this Privacy Policy and, if required, the Data Subject’s consent has been obtained;
- The third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- The transfer complies with any applicable cross border transfer restrictions; and
- Where an appropriate written contract or agreement that contains data protection clauses has been agreed.

## **8. Record keeping**

How we record the data we hold

We are required to keep full and accurate records of all our Data Processing activities.

## **9. Your choices, Obligations and Rights**

### **How long we keep your data for**

We only hold your personal information for as long as is necessary to provide services to you unless there is a requirement to hold that information for a longer period – for example where we are subject to a statutory obligation to keep hold of your information e.g. financial records. To be able to fulfil our contractual and service obligations with our customers we retain your information for the duration of a contract plus one year, in case you should have any queries. If there is a possibility that you may have a legal claim against us or you have made a complaint against us, then we will hold your information for the duration of any statutory limitation period associated with the claim.

Where you opt in to receive Marketing from us, we will retain this information for three years, before needing to ask you to re-subscribe. All our Marketing emails have an unsubscribe option clearly visible and you can also unsubscribe at any time by emailing us [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

### **Security of your data**

Aura Air are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure we have put in place robust physical, electronic and managerial procedures to safeguard and secure the information we collect, including for example If at any point you become aware of a security incident or you have reason to suspect that your data may have been compromised (e.g. you receive a suspicious communication about you), please forward the communication to us or report the incident by email to [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

If you have been the victim of a fraudulent transaction (or that you have reason to suspect that you may have done) whether or not this relates to your dealings with Aura Air you should always contact the police and/or your bank in the first instance to ensure your own finances are secure.

## **More about your information - your rights**

You may request a correction or update your personal information at any time by emailing [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

Please include your name, address and email address when you contact us as this helps us to ensure that we accept amendments only from the correct person and can contact you to verify your identity should this be necessary. We encourage you to promptly update your personal information if it changes and we will action any such requests as quickly as we reasonably can.

We will securely retain your information for as long as is reasonably necessary and in accordance with law applicable at the time. If you wish to submit a request that your data be deleted, please email us using [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

You have the right to receive a copy of the personal information that we hold about you. Please email us using [info@aura-air.co.uk](mailto:info@aura-air.co.uk) if you wish to exercise this right.

If you receive Marketing information from us, you can of course change your mind and unsubscribe by contacting us at any point using [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

## **10. Complaints to the Regulator**

### **Complaints to the Regulator**

If you do not think that we have processed your data in accordance with this notice, please contact us by email using [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

If you are not satisfied with our response, you can refer the matter to the Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk](http://www.ico.org.uk)

## **11. Changes to this Policy**

### **Notification of Changes**

Aura Air reserve the right to change this policy at any time. Where appropriate, Aura Air will notify Data Subjects of those changes in writing (letter or email). An up-to-date copy of this Policy will always be held on our website.

Each revised copy will have a version number and date on it. You can also request an up-to-date version by emailing us using [info@aura-air.co.uk](mailto:info@aura-air.co.uk)

## **CONTACT INFO**

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