

Eternity Technologies Limited Privacy Notice

Eternity Technologies Limited takes the privacy and security of Personal Information seriously and is committed to ensuring it is compliant with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of Personal Data, the General Data Protection Regulation.

This Privacy Notice sets out how Eternity Technologies processes and protects the Personal Data of all individuals with whom it comes into contact, other than its own employees. This includes individuals who are, or who are engaged by, Eternity Technologies customers, suppliers and other third parties, or with whom it otherwise deals. This Privacy Notice includes the information which the General Data Protection Regulation requires Eternity Technologies to provide, including a statement of the rights of such individuals.

Definitions Used:

Personal Data or Personal Information: means information capable of identifying an individual, being "Personal Data" as defined in the General Data Protection Regulation

Processing (and cognate expressions) means any operation we perform on Personal Data, including, but not limited to, collection, organising, storing, updating, using, disclosing and erasing it.

Who we are and How to Contact Us

This Privacy Notice is issued by Eternity Technologies Limited, comprising the following Companies:

- Eternity Technologies Limited [Unit 5 Parkway 4, Longbridge Road, Trafford Park, Manchester, England, M17 1SN, CRN: 07233019]

Each such Company is the Data Controller of the Personal Data which it processes. References in this Privacy Notice to Eternity Technologies are to the applicable Company, or, where the context requires, to all Companies within Eternity Technologies.

In relation to Eternity Technologies processing of Personal Data or any other Data Protection or Data Privacy Matters, Eternity Technologies contact details are as follows: Mail Address: Unit 5 Parkway 4, Longbridge Road, Trafford Park, Manchester, England, M17 1SN Email Address: ddoyle@eternitytechnologies.co.uk

Purposes for which Eternity Technologies Processes Personal Data

Eternity Technologies holds and further processes Personal Information on its customers, suppliers and individuals engaged by them and others with whom it deals, such as names, contact details and bank/account details, in order to:

- Manage its relationship with its customers, including providing them with products and/or services, communicating with them and maintaining its relationship with them
- Manage its relationship with its suppliers, including procuring products and/or services from them, communicating with them and maintaining its relationship with them
- Managing relationships with intermediaries and other third parties
- Informing customers and potential customers about its products and services, including by direct marketing
- Inviting relevant individuals to events
- Informing suppliers and potential suppliers about its requirements
- To provide features or tools on its websites
- To develop and improve its products and services
- To track purchase history
- For account and promotional purposes
- If necessary, to comply with any legal obligations it may have including requests from law enforcement agencies or to comply with legal processes
- For internal administration

- To detect and prevent fraud
- Ensuring information and networking security
- To exercise its rights
- To protect the rights, property or personal safety of its employees, third parties, business partners and the general public
- Purposes related to its proposed corporate activities, such as a sale or merger.

These are referred to in this Privacy Notice as the purposes of processing

Legal bases for Eternity Technologies processing of Personal Data

The legal bases on which Eternity Technologies Processes Personal Data are as follows, depending on the purpose of the processing:

- **Legitimate Interests.** In most cases, the purposes set out above represent the Legitimate Interests of Eternity Technologies in operating its business and the processing is necessary to achieve them and does not override the interests, fundamental rights or freedoms of the individuals concerned
- **Performance of a contract.** Sometimes Eternity Technologies needs to process Personal Data to perform a contract to which the individual is a party or to take steps at the individual's request before entering into a contract, for example to provide goods or services to customers who are individuals or to purchase goods or services from suppliers who are individuals.
- **Legal Obligation.** Eternity Technologies may need to process Personal Data to comply with a Legal Obligation, such as an enforceable request from Government.
- **Consent** - In certain specific situations, Eternity Technologies may process Personal Data as a result of having obtained the specific freely given consent of the individual concerned. When doing so, Eternity Technologies will inform the individual of the purpose of the processing and the individual can withdraw consent at any time.

Recipients of Personal Data

Eternity Technologies may disclose or transfer Personal Data to the following recipients:

- Third-party service providers for the purposes of providing services to Eternity Technologies itself, which may include I.T. maintenance and service providers and providers of Finance and Accounting software systems or services;
- Third-party service providers for the purposes of providing services to the customers and suppliers of Eternity Technologies or other persons with whom it deals;
- Other members of Eternity Technologies or other Companies or Organisations under common ownership with Eternity Technologies in either case, for administrative or internal purposes and/or so that they can contact individuals or those engaging them with information about products or services which may be of interest to them
- Authorities and other bodies who can compel Eternity Technologies to do so under applicable law.

Eternity Technologies will not sell Personal Information to third parties unless it has the specific consent of the individual concerned.

Transfer of Personal Data outside the EU

Eternity Technologies may transfer Personal Data outside the EU, for example where any of the recipients described above are located outside the EU or in respect of Eternity Technologies own operations outside the EU. Non-EU countries do not have the same data protection laws as the EU and therefore often do not provide the same safeguards. On occasion, such transfer is necessary to perform a contract with an individual. In other cases, where such transfer occurs, Eternity Technologies will ensure at least one of the following safeguards is implemented:

- The transfer is to a country that has been deemed to provide an adequate level of protection for Personal Data by the European Commission; or
- Eternity Technologies transfers the Personal Data under a specific contract with the recipient in a form adopted by the European Commission or adopted by a supervisory authority and approved by the European Commission, for example the standard contractual clauses issued under decision 2001/497/EC, decision 2004/915/ or decision 2010/87/EU; or
- Eternity Technologies transfers the Personal Data under approved binding corporate rules of Eternity Technologies; or
- Where the transfer is to the USA, the recipient is within the EU-US Privacy Shield.

Copies of the relevant safeguards can be obtained from Eternity Technologies using the contact details set out above.

Period of storage of Personal Data

Eternity Technologies will not keep Personal Information for longer than is necessary for the purposes for which it processes it. This is determined in accordance with its Retention Policy.

The criteria used to determine the Retention Periods of Eternity Technologies include: (i) the nature of the Personal Data; (ii) the length of time Eternity Technologies has a continuing relationship with the individual or the Organisation engaging the individual; (iii) whether there is a legal obligation to which Eternity Technologies is subject requiring it to retain the Personal Data (iv) whether retention for a period is advisable in light of Eternity Technologies legitimate interests (such as with regard to applicable statutes of limitations or regulatory investigations).

Based on the above, Eternity Technologies Policy is to retain Personal Data about individuals for three (3) years from the last contact with the individual or Organisation concerned except where it relates to statutory, regulatory, legal or security reasons or if it includes a transaction or financial data in which case Eternity Technologies retain it for up to seven (7) years from the data of the transaction or last active use of the financial data.

Rights of Individuals in relation to their Personal Data

Individuals have the following rights where Eternity Technologies processes their Personal Data

- To obtain confirmation as to whether or not Eternity Technologies processes their Personal Data
- To access a copy of their Personal Data that Eternity Technologies does process
- To request the correction of inaccurate Personal Data held by Eternity Technologies
- To request that Eternity Technologies erases their data or to object to Eternity Technologies continuing to process it
- Where Eternity Technologies relies on having obtained consent for the purposes of the processing, the right to withdraw such consent, without affecting the lawfulness of processing before such withdrawal
- In certain cases, to receive Personal Data, which they have provided to Eternity Technologies, in a structured, commonly used and machine-readable format and to transmit it to another controller or have it directly so transmitted
- To lodge a complaint with their local Data Protection Regulator — in the UK, this is the Information Commissioner's Office, <https://ico.org.uk/>

Should individuals have any queries regarding Eternity Technologies Privacy Notice, the processing of their Personal Data or wish to exercise their rights they should contact Eternity Technologies directly using the following email address: ddoyle@eternitytechnologies.co.uk