

## Aleron Privacy Policy

Our Privacy Policy explains how Aleron collects, uses and discloses information about you. It applies to the processing of information about you as an individual that we collect when you use our website, sign up to our newsletter or other email communications, or communicate directly with us.

### 1. Collection of Information

We collect information about you, which may include your name, email address, postal address, phone number and any other information that you choose to provide when you:

- Visit our website.
- Sign up to our newsletter or other email series, such as briefing paper/blog post notifications.
- Take part in surveys or other forms of online consultation.
- Communicate with us.

We may also automatically collect information about your use of our website to help us understand our audience and create the best customer experience:

- **Log Information:** We collect log information about your use of the website, including the type of browser used; the time, duration and frequency of access; website pages viewed; your IP address; and the page visited before visiting our website.
- **Device Information:** We collect information about the computer or mobile device used to access our website, including the hardware model, operating system and version and mobile network.
- **Location Information:** We may collect information about the location of your device when you use our website based on your consent to the collection of this information.
- **Information collected by cookies and other tracking technologies:** We and our service providers may collect information using cookies (small data files stored on your hard drive or in device memory that track usage).

### 2. Use of Information

Collecting data helps us to create the best client experience. Specifically, we may use data:

- For our own internal records, to ensure they are accurate and up to date.
- To improve our services.
- To respond to your comments, questions and requests, and provide customer service;
- To communicate news and information that we think will be of interest to you, to conduct online surveys, and to contact you about events and promotions offered by us and selected others; and,
- To operate our website, including to process transactions, monitor and analyse trends, usage, and activities in connection with our website and its performance;
- To send you technical notices, updates, security alerts and support, and administrative messages.
- To comply with applicable law and government requests.

We may also use your information for other purposes described to you at the time we collected it.

Our legal basis for collecting and using the information will depend on the type of information and the specific context in which we collect it.

- Legitimate interests: We process information about you primarily to provide services. We also process information about you where it is in our legitimate interests to do so and not overridden by your rights (for example, in some cases for direct marketing, fraud prevention, network and information systems security, responding to your communications, the operation of networks of groups by the network administrators, and improving our website).
- Consent: We process information about you for if you have given us your express consent, for example by signing up for our newsletter (which requires two-step verification and can be withdrawn at any time)
- Contract: We may process information to perform a contract.

### **3. Keeping your information up to date**

To make sure we always have the most up-to-date information about how to contact you, we may also, from time to time, update your records to reflect any changes to your personal information. This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy and in circumstances where it is appropriate and where you will have had a clear expectation that your details would be passed on for this purpose. We may also combine the information you provide us with information we collect from trusted third parties and partners, business partners, or sub-contractors (where applicable and relevant)

### **4. Sharing of Information**

We will only disclose your personal information to third parties if we are legally obliged to; or in order to enforce or apply our terms of use for this website or other agreements; or to protect the rights, property or safety of Aleron. This includes exchanging information with other companies and organisations for the purposes of fraud detection or criminal investigations and would request your consent.

We will never rent or sell your identifiable personal information to other organisations for use by them in any way, including in their own direct marketing activities.

We may disclose information about you to third-party service providers who help us to operate or improve our website or other aspects of our externally-facing IT infrastructure (such as newsletter platforms) to assist with certain functions, such as: email transmission, conducting surveys, data hosting, web analytics and some aspects of our technical and customer support. We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorise, subject to confidentiality obligations.

We may also share de-identified or aggregated information that no longer identifies you.

If Aleron is involved in a merger, acquisition, financing, reorganisation, bankruptcy, or sale of our assets, information about you may be shared, sold, or transferred as part of that transaction. We may also share information about you with future corporate parents and subsidiaries.

### **5. Security**

We protect your information that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. We store all information that you provide to us on secure servers or with third-party service providers with secure servers. We use firewalls to protect against intruders and test for network vulnerabilities. We train employees about our data privacy

policies and procedures, and only permit authorised employees to access information if necessary to their role. We also seek to continuously improve our security approach in line with best practice through accreditation such as the UK Government's Cyber Essentials scheme.

However, while we have taken all steps reasonably necessary to make sure your data is treated securely, we acknowledge that no method of transmission over the internet or method of electronic storage is completely secure. As such, we cannot guarantee the security of your data transmitted to our website. This means any such transmission is at your own risk. In cases when we use external websites provided by other organisations such as Twitter, YouTube or Facebook, then we would ask you to consult their privacy policies.

This website may further include links to other websites, not owned or managed by Aleron. Whilst we try our best to only link to reputable websites we cannot be held responsible for the privacy of data collected by sites not managed by Aleron, nor can we accept responsibility or liability for those policies. For this reason, you should consult the privacy policy on any external website you link to before you submit any data to those websites.

Where you have a password to use our services, you are responsible for keeping this password secure and confidential. If you would like to update or change your password, you may select the "Forgot your password?" link on the login page. You will be sent an email to reset your password.

## **6. Data Retention**

We retain certain information that we collect from you for the following reasons:

- So you can use our website;
- To ensure that we do not communicate with you if you have asked us not to;
- To better understand the traffic to our website so we can provide all users with the best experience;
- To detect and prevent abuse of our website and illegal activities
- To comply with applicable legal, tax or accounting requirements.

If we have no ongoing legitimate business need to process your information, we will either delete or anonymise it.

## **7. Posting Content**

Aleron employees adhere to a social media policy and we expect those who interact with us on social media platforms to follow a similar code of conduct. If you post or send any content that we believe to be inappropriate or content in breach of any laws, such as defamatory content, we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies. This also covers any activity on social media.

Please also note that we have the right to disclose your identity to any third party claiming to own any content that you posted.

## **8. Your Choices**

You can disable or control cookies that collect information about your use of our website through your browser settings.

You can also control messages that you receive from Aleron by selecting the 'update preferences' or 'unsubscribe' link in the messages that you receive. If you opt out, we may still send you non-marketing/campaign messages, such as those about our ongoing business relations. You can further manage your contact preferences by emailing Aleron directly, at [nicolas.ponset@alerongroup.com](mailto:nicolas.ponset@alerongroup.com)

## 9. Data Rights

We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact Aleron on these issues by sending an email to [nicolas.ponset@alerongroup.com](mailto:nicolas.ponset@alerongroup.com)

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the "unsubscribe" link in the emails we send you.
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority.

## 10. Contact Us

If you have any questions about this policy, please email [nicolas.ponset@alerongroup.com](mailto:nicolas.ponset@alerongroup.com) or write to: Data Protection Officer, Aleron, 252B Gray's Inn Rd, London WC1X 8XG.

*This policy is reviewed and updated on a periodic basis*

*[Last updated: 23rd May 2018]*