Privacy Policy



Effective Date: 07 November 2024 **Last Review:** 07 November 2024

Introduction

This privacy policy outlines Elite's ("we", "our" or "the company") information collection and storage practices affecting:

- users that access our websites ("sites"):
 - https://elite.net.uk
 - https://login.elite.net.uk
 - o https://hosting.elite.net.uk
 - https://cp.eliteukserve.net
- or otherwise share their personal information with us (collectively: "users").

Elite is the "responsible authority" for users' privacy: as defined by data protection laws, in particular the General Data Protection Regulation (GDPR).

Elite is:

- a "data controller".
- made up of different legal entities (including Elite Limited, Elite Hosting Limited and Elite Group Limited).

This privacy notice:

- is issued on behalf of Elite (and therefore all its entities).
- aims to give you information on how we collect and process your personal data.
- outlines your data protection rights
 - o under the EU data protection regime
 - o and introduced by the GDPR (Regulation 2016/679).

This applies to you if:

- we collect and store your personal data through:
 - o your use of our website and/or social media channels
 - o being one of our customers (or negotiating to be a potential customer)
 - o leasing us property (or negotiating the potential lease of property to us)
 - o applying for employment or to work with us as a partner
 - o sending us correspondence and/or providing us with products and/or services.

Elite's registered address is:

8 Acorn Business Centre Northarbour Road Portsmouth PO6 3TH

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and our Data Protection Officer (DPO) is Jessica Cooper.

If you have any questions about this policy or our privacy practices, please email us at <u>legal@elite.uk</u> or call us on +44 330 122 0300.

We will refresh this policy to ensure it remains up to date with relevant legal requirements and/or company changes.

How we collect information

We gather information from third-party providers, services and public registers and also when you:

- use or access our sites
- fill out a contact form on our sites
- download our documents online or through paid for advertising
- · engage with our paid for advertising
- engage with our team members at events or online

What information is collected

There are two types of information we collect.

- 1. Unidentified / Non-identifiable user information. In these cases, we will not know the user's identity. Either it will be device related, like:
 - the type of browser and operating system your device uses
 - language preferences
 - access time

Or about the user journey in our online environments, like:

- pages viewed
- browse time
- clicks
- 2. Personal information. In these cases, the information will either identify an individual or may with reasonable effort identify an individual. Again, it could be device related:
 - geolocation data
 - IP address
 - unique identifiers (e.g.: MAC address and UUID)

Or contact information that has been shared like:

- full name
- email
- phone number
- company name
- site/project information

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How is the information used?

We do not rent or sell user's information to third parties.

We may use the information to:

- Communicate with you and:
 - o send notices regarding our services
 - o follow up on initial engagements
 - o provide business updates
 - respond to any customers enquires
- Share advertisements once you use our sites.
- Gather statistics and insights that help us improve our sites.
- Deliver a contracted service via a third-party supplier/vendor.

Third party service providers working on our behalf

We may pass your information to our:

- agents,
- subcontractors,
- and other associated organisations.

For the purposes of completing tasks and providing services to you on our behalf (e.g. to resolve problems and then send you an update).

However, we will only disclose the personal information that is necessary to deliver the service, and we have a contract in place that requires them to:

- keep your information secure
- not use it for their own direct marketing purposes.

We may also have to transfer your personal information to a third party:

- if required by law (e.g. because of a court order or to prevent of fraud or another crime)
- as part of a sale of some or all of our business and assets
- as part of any business restructuring or reorganisation
- to enforce or apply our terms of use or to protect the rights, property or safety of our customers

However, we will take steps to ensure that your privacy rights continue to be protected.

Transfer of data outside the EEA

Third party contacts may be located outside the European Economic Area. In such cases, we only will transfer your data to contacts in countries approved by the European Commission as providing an adequate level of data protection.

Cookies

Cookies are small text files that we use to improve your experience of our website. The cookie file is generated by our website and is accepted and processed by your computer's browser software. You can disable the cookies using your browser's options, although if you do this, you may not be able to use some of the services shown on our sites.

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Our sites use two types of cookies:

- 1. **Session cookies:** which are only stored temporarily during a browsing session. These allow normal use of the sites and are deleted from your device when the browser is closed.
- 2. **Third party cookies:** which are set by other online services that run content on the page you are viewing. For example, Google who monitor and analyse web access for search engine ranking.

Cookies do not contain any information that personally identifies you however personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies. If you would like to disable cookies, learn how here: https://www.allaboutcookies.org/manage-cookies/clear-cookies-installed.html

Advertisements

We may use a third-party advertising technology to share advertisements when you access our sites. This technology uses your information to place third-party cookies on your web browser.

Keeping your information safe

We take data protection and data security very seriously. We have implemented several organisational and technical measures to ensure that:

- only the people who need to see the data are allowed access
- that the data is protected when stored and transmitted.

Data retention

Our data retention policy details the length of time we keep the various types of personal data for. There are some statutory data retention periods that we must comply with but in general if we have not been in contact with you for two years, we will delete the personal data we collected from you from our systems.

Data accuracy

We want the information we hold about you to be correct. Therefore, if you have new, or updated information, please tell us about the changes.

Data erasure

If you do not want us to hold personal data about you anymore, just let us know. We will remove your data immediately:

- once we have verified that you or your next of kin made the request
- unless there are statutory reasons for us to retain the data for a certain period

Subject access requests

It is your right to know which personal data we hold about you. If you want to know, please ask in writing and we will confirm:

- once we have verified that you or your next of kin made the request
- within 48 hours of verification

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