

Data Processing Policy: how we will use your data

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AVT Reliability Limited (“**AVT**”) is committed to protecting and respecting your privacy. This Data Processing Policy (the ‘Policy’) sets out the basis on which any data we collect from or on behalf of you, or that you provide to us, will be processed by us. We ask that you read this Policy carefully as it contains important information about how we will use your personal data.

For the purpose of the Data Protection Act 1998 (the "**Act**"), the data controller is AVT Reliability Limited of AES Engineering Limited, Global Technology Centre Bradmarsh Business Park, Mill Close, Rotherham, South Yorkshire, S60 1BZ, United Kingdom (Company No. 01829338).

Personal data we may collect about you

You may give us personal data about you (such as your name, work address, e-mail address and phone number) whenever you contact us, either by telephone, letter, our websites www.avtreliability.com and <https://portal.machinesentry.com> (each “**our site**”), or in any other way. For example, we may obtain some personal data when a Licensee registers you as a “Service User”, when you register as a user or upload content and information to our site.

We will receive data from various sources, and this may include sensor data from Devices, analysis, reports from third parties as well as data uploaded by other Service Users. It is possible this data might contain personal data.

How we use your data

We will use your data for the purposes described in this Policy. These purposes include:

- helping us identify you and any data you have uploaded to us;
- administering any orders placed and to provide you or your authorising Licensee with the information, products and services that have been requested;
- keeping you updated on the products and services which are available on our website by providing you with direct marketing communications through a number of channels; see ‘**Marketing and opting out**’;
- providing you with information about other goods and services we offer that are similar to those that you have already purchased, enquired about, or which we reasonably anticipate you may require;

- notifying you about changes to our services;
- ensuring that content from our site and services is presented in the most effective manner for you and for your computer or other device;
- seeking feedback on how we can improve the goods and services we offer;
- fraud prevention and detection;
- dealing with any concerns raised by you or others in relation to your products or anything you or others have uploaded to our site;
- security vetting;
- improving our services;
- analysing the effectiveness of our marketing and communication;
- analysing anonymised and aggregated data, which may be provided to third parties;
- we may provide copies of data we hold on behalf of a Licensee or former Licensee where requested to do so (see under '**Your rights**' below); and
- we may retain backup copies of data.

Marketing and opting out

Unless you have asked us not to do so, we may contact you by a number of channels (including mail, telephone and email) with information that we believe may be of interest to you, including updates on the work that we are doing and events. If you prefer not to receive any direct marketing communications from us, you can opt out at any time. See '**Your rights**' below for more information.

Disclosure of your personal data

We may disclose your personal data to:

- other entities within our group;
- our agents and service providers (who may help run some of our administrative operations such as web hosting, payment processing, maintenance services or email distribution) some of whom may be outside the EEA (see '**Transfers of data out of the EEA**' below);
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- users of our website where it has been uploaded to be shown on an area of our site accessible by other users; and
- others in IP disputes concerning your products.

Keeping your data secure

We will use various proprietary and confidential technical and organisational measures to safeguard your data. For example we store your personal data on secure servers and only disclose your personal data to third parties that also provide adequate protections. Whilst we will use all reasonable efforts to safeguard your data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any data which are transferred to us on your behalf, from you or to you, or to a third party, via the internet.

Monitoring

We may monitor information about the state of devices connecting to the service, such as calibration status.

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of training, fraud prevention and compliance.

We may monitor your use of our site through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit our website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. Please see further the section on '**Use of cookies**' below. If you receive emails from us we may also be able to monitor which of our emails you have opened and any links within the emails that you click on.

Use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Transfers of data out of the EEA

We may need to transfer your personal data to countries outside of the European Economic Area for the purpose of administering some of our operations such as web hosting, payment processing, maintenance services or email distribution. Any transfer of your data will be compliant with the legal safeguards provided by the Act and will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

Your rights

Licensees and recent former Licensees may request copies of their data held by AVT while they are a Licensee and for 3 months after they cease being a Licensee. Data will be

provided in a format and on media as agreed between that Licensee or former Licensee and AVT. Administration fees may be required from the Licensee or former Licensee.

Individuals have the right, subject to the payment of a small fee (currently £10) to request access to personal data which we may process about you. If you wish to exercise this right you should:

- put your request in writing;
- include proof of your identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill);
- attach a cheque in the amount of £10 made payable to AVT Reliability Limited; and
- specify the personal data you want to access.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right you should:

- put your request in writing;
- provide us with enough information to identify you; and
- specify the information that is incorrect and what you believe should replace it.

You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right you should:

- put your request in writing (an email sent to admin@avtreliability.com with a header that says 'Unsubscribe' is acceptable)
- provide us with enough information to identify you
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (eg email or telephone) please specify the channel you are objecting to. It is also possible to unsubscribe from email marketing only using the 'unsubscribe' link provided in each email we send

Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his or her personal data
- receive on his/her behalf any data protection notices
- give consent to the transfer of his/her personal data abroad

Our contact details

We welcome your feedback and questions. If you wish to contact us, please send an email to admin@avtreliability.com or you can write to us at AVT Reliability, Unit 2 Easter Court, Europa Boulevard, Warrington, Cheshire, WA5 7ZB or call us on 0161 4863737.

We may change this Policy from time to time. You should check this Policy occasionally to ensure you are aware of the most recent version which will apply each time you access our site, the services we provide or you provide us with personal information in another way.