



Data Processing Policy

1 Who does this policy cover?

This policy applies to all customers, employees, contractors, partners, suppliers, job candidates, or any other third party who has legitimate need to access Safety Software Limited's systems.

2 What kinds of information do we process?

We process different kinds of information depending on how you are engaging with us. This data includes Personally Identifiable Information (PII), Usage Information, and User Generated Information.

- **Personally Identifiable Information (PII)**

As an employer and in the course of providing services to our customers, we collect personally identifiable information (PII) and process it via our website, systems and services. We may also collect PII from events we host or participate in and from third parties we may contract with to acquire data.

PII means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This policy describes the ways in which we process PII. Processing is any automated or manual operation that we may perform on PII. Examples include but are not limited to collection, use, creation, storage, transfer, and deletion. Safety Software Limited have contractual, legal, and regulatory obligations to process PII securely. This policy communicates Safety Software Limited's commitment to the secure processing of this PII.

- **Usage Information**

In the course of providing services, data is generated by your use of the Airsweb product, service, or websites. When you visit the Airsweb websites, your browsing generates information like logs that include

information about what pages you visited, what content you interacted with, and when you visit pages and interact with elements on them.

Airswab products and services and their associated software like web portals, mobile applications, and other tools may also generate information when you use them. We may collect this information and use it as described in this policy. This information can include data about how often you use our products, performance related information like crashes and memory consumption, information about how you interact with our user interfaces, and other information related to the way our products and services are performing.

- **User Generated Information**

This varies depending on what products, services, or websites you are interacting with but examples include messages you send to us via our websites; search queries; photos, videos, and sound recordings you create with our mobile applications; and reports, charts, and other documents you create using our products. User Generated Information may also include PII, for example when a user of one of our products submits a report relating to an incident you and others may have been involved in.

2.1 Principles relating to processing of PII

As outlined in the General Data Protection Regulation (GDPR), PII shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that PII that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the PII is processed;
- f) processed in a manner that ensures appropriate security of the PII, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The legal basis for the processing of PII can include:

- consent from PII principals ('data subjects')
- performance of a contract
- compliance with a legal obligation
- protection of the vital interests of PII principals ('data subjects')

- performance of a task carried out in the public interest
- legitimate interests of the PII controller

We obtain PII in different ways depending upon how you are engaging with us. What we collect and the legal bases for the PII processing are set out below.

2.2 PII processing as a Data Controller

As an employer, we will collect, use, and store the following PII necessary for employment at Safety Software Limited. This may be directly from you or from publicly accessible sources such as social media profiles:

- Contact details including emergency contact details
- Date of birth
- Nationality
- Bank details
- Tax details
- Pension details
- Sickness details
- Information stated on any CV submitted
- Educational attainment e.g. exam certificates
- Proof of eligibility to work in the UK
- Job details e.g. current job title, pay details
- References received

2.2.1 Lawful basis for PII processing as a Data Controller

We use the PII detailed in 2.2 above:

- to assess your skills to ensure that you can fulfil the job role applied for ('performance of a contract')
- to assess your performance ('performance of a contract')
- to enable us to perform background checks and obtain references for you ('performance of a contract')
- to be able to contact you ('performance of a contract' and 'compliance with a legal obligation')
- to be able to contact your next of kin in the event of an emergency ('performance of a contract')
- to ensure you are eligible to work in the UK ('compliance with a legal obligation')
- to be able to process your salary payments and pay PAYE to HMRC ('compliance with a legal obligation')
- to be able to process your pension payments ('compliance with a legal obligation')

If we should ever require 'consent from PII principals ('data subjects') as the legal basis for our processing of PII, we shall obtain a written declaration from you to demonstrate that you have consented to processing of your PII.

2.2.2 Processing of special categories of PII as a Data Controller

Should we identify a need to process special categories of PII, as defined in GDPR, in relation to your employment at Safety Software Limited, we will only request and process the minimum necessary for the specified purpose and only if there is a lawful basis for the processing. For example, data concerning health (sickness details) is collected, used, and stored.

2.3 PII processing as a Data Processor

In the course of providing software services to our customers, we receive, process, and store PII on their behalf. This may include, but not limited to:

- Names and addresses
- Dates of birth
- Contact details
- Job details e.g. current job title, time in role, payroll number, department code etc.

2.3.1 Lawful basis for PII processing as a Data Processor

We process the PII detailed in 2.3 above under the authority of and instruction of the customer governed by a contract that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of PII and categories of PII principals and the obligations and rights of the customer. The customer is obliged to comply with all applicable laws and regulations with respect to its activities as a data controller.

2.3.2 Processing of special categories of PII as a Data Processor

In the course of providing services to our customers, we may be required to process special categories of PII, as defined in GDPR, during the performance of a contract with our customer. We will only process this category of PII on behalf of the customer and only for the specified purpose.

2.4 PII sharing, transfer and disclosure

We will make information we have collected available to third parties under the following circumstances.

- *Where required by law.* We will make information available to government agencies who serve us with valid legal process. If this information includes PII or your proprietary User Generated Information, we will notify you of governmental requests for information where permitted to do so by law.
- *Where we have relationships with service providers.* We may partner with third parties in the ordinary course of our business to perform services or provide product functionality on our behalf. Examples include recruitment software providers; payment processors; hosting providers; marketing and

market research providers; resellers of our products and services; data brokers who help us supplement our records with publicly available information; and call center and other service providers supporting our customer service personnel. Our contracts with service providers require them to implement reasonable and appropriate safeguards for information we share with them and limit their rights to use that information to purposes consistent with this policy.

- *In order to protect our rights or the rights of third parties.* We may share information with legal counsel, auditors, and related service providers in the course of evaluating or pursuing potential claims involving enforcement of our or third parties' contractual and other legal rights. We will take steps to ensure that we disclose only the information necessary for this purpose and impose confidentiality obligations and use restrictions consistent with this policy where appropriate.
- *With Airsweb affiliates around the world.* We have personnel and operations in countries around the world who work together to deliver products and services and process information as described in this policy. These affiliates may reside in countries other than the one where you reside, including the United States. Laws governing processing of information, including PII, vary from country to country and may differ from the laws applicable in your home country. All Airsweb affiliates and personnel comply with the terms of this policy when processing information. Your use of our products, services, and websites constitutes your permission for us to share information with our affiliates without restriction.

3 What do we do with information we process?

When we process information, we do so in order to fulfill our legitimate business purposes. These include:

- *Delivering requested functionality.* Many features of our products, services, and websites process information in response to your requests. For example, we collect PII like your email address and profile information so you can log into our websites and use our products and services. If you use our websites to communicate with us, we collect PII and User Generated information like your name, contact information, and message content and make it available to the people who will be responding to you. When you browse our websites or use our tools, applications, and other software, we collect User Generated Information you make available to us in order to incorporate it into reports and other documents you wish to create (which are themselves User Generated Information).
- *Protecting our rights.* When we license software products to you, we reserve the right to collect PII like your account credentials and information about the computers and mobile devices you use to access licensed products and Usage Information like the number of unique users logging into our software in order to monitor compliance with the terms of our license agreements with our customers.

- *Supporting our users.* We collect Usage Information like errors that occur when you use our products, services, and websites and logs that describe when and how you interact with our user interfaces so we can better diagnose and resolve technical problems you may experience.
- *Improving our products, services, and websites.* We may use PII we have collected to ask you to participate in surveys, focus groups, and other forums where we will solicit feedback about your user experience. We may also collect and use anonymous Usage Information about errors and interactions with our user interfaces and excerpts from User Generated Information like support and service requests. We use this information to identify, prioritise, and develop patches, enhancements, and other improvements to our products, services, and websites as well as to create new products and services responsive to our customers' needs.
- *Promoting our products, and services.* We use PII we collect from our websites, events we sponsor online and in person, from downloads of publications we make available ourselves or through partners to identify potential customers for our products and services and to contact them to initiate sales efforts. We also use PII we have collected from existing customers along with Usage Information about how their users interact with our products and services and User Generated Information like issues you have raised with our support teams to identify other Airsweb products and services our customers might be interested in and to reach out to them to discuss new business. We may supplement PII we have collected with information we get from third parties in order to improve our data about potential leads.

4 How do we secure information we process?

When we collect and store information on our systems as described in this policy, we apply reasonable and appropriate administrative, physical, and technical safeguards to detect and prevent unauthorised access, disclosure, use, and loss of Personal and User Generated Information. These safeguards include monitoring and auditing of our IT infrastructure, encryption of files in transit and at rest, strong password policies, limiting access to User Generated and PII to personnel with a legitimate business purpose, and where applicable, data protection training for our personnel. When our customers choose to host our products within their own networks, PII and User Generated Information are wholly customer controlled and subject to their individual security practices.

If we discover or reasonably suspect that there has been unauthorised access, disclosure, use, loss, or other processing of your PII or User Generated Information (a "security incident") we will notify you by email address we have on file without undue delay.

No safeguards are 100 percent effective. While our safeguards offer a reasonable and appropriate level of protection to information that we process, we do not warrant or guarantee that data we process will never be affected by a security incident.

5 What do we do with Children's PII?

Our products, services, and websites are not intended for use by children. We never intentionally collect information from children. If we discover that we have collected a child's PII intentionally, we will delete it.

6 What are my rights under this policy?

You have the right to access, correct, modify and/or erase PII we have collected from you. You also have the right to object to the processing of PII we have collected from you. You have the right to withdraw your consent for the processing of your PII. Contact us via email to dpo@airsweb.com.

You have the right to export PII we process for you as a customer. Your Account Manager can assist you with these requests.

You have the right to opt into and out of receiving marketing communications from us. When we collect PII, we will give you the opportunity to decide whether you want to receive marketing communications from us or not. No matter what you decide, you will have the opportunity to change your mind later. Your decisions with respect to marketing communications will not affect your ability to receive communications that are based on existing business relationships like customer satisfaction outreach, acknowledgement of transactions, customer service follow-up, and so on.

You have a right to be notified of changes to this policy. If we make material changes that affect the rights and/or responsibilities described in this policy, we will publish notice of changes to our websites. Airsweb customers will also receive notices via email. If you continue to use our products, services, or websites we will consider that acceptance of the changes.

6.1 Subject Access Request

You may make a subject access request to find out the answers to the following questions:

- What PII we hold about you?
- How we are using it?
- Who we are sharing it with?
- Where we got your PII from?

Contact us via email to dpo@airsweb.com.

If we are not the data controller, we will refer the subject access request to the data controller.

7 How do I contact you with questions or requests relating to this policy?

The best way to contact us if you are a customer is via email to support@airsweb.com. Our client services team will log a support ticket and direct your question or request to the right personnel who can assist you. They will also track progress of your support ticket to ensure that it gets resolved.

If you are not a customer, please email dpo@airsweb.com.

You may also reach us by letter addressed to:

Data Protection Officer
Safety Software Limited
Rockland House
View Road
Rainhill
Prescot
Merseyside
L35 0LF
United Kingdom