

Privacy Notice for Clients

Damarel Systems International Ltd of The Granary, Grange Court, Grange Road, Tongham, Farnham, Surrey GU10 1DW are committed to protecting and respecting your privacy.

This policy (together with our Standard Terms of Supply), sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (Regulation (EU) 2016/679) (<https://gdpr-info.eu/>) (the “GDPR”).

“data controller”, “data processor”, “data subject”, “personal data”, “special categories personal data”, “processing”, “supervisory authority” and “third party” have the meanings set out in the GDPR.

1. Our roles as Controller and Processor

We act as data controller where you have asked us to provide you with marketing information.

We act as data controller where you have a contract with us to supply services.

We may also act as data processor for any contract you have with us to supply services delivered as Software as a Service (SaaS).

The details for each of these areas is in the relevant section below.

2. Marketing

2.1 The purpose of processing your personal data

We use your personal data for the following purposes:

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) To manage your subscription to our company newsletter	Name, company, position title, company address, company telephone number, company mobile phone number, company email address, incident number	Legitimate interest – managing your subscription to our newsletter
2) To keep you informed of specific product developments	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Legitimate interest – to keep you up-to-date with product developments and enhancements we have made to products you use or we believe would be of interest to you

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
3) To invite you to Trade Shows where we are exhibiting	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Legitimate interest – to invite you to meet us at trade shows

2.2 The purpose of processing your special category personal data

We do not process any special category personal data for marketing purposes.

2.3 How long we keep your personal data

We keep your personal data for as long as you would like to subscribe to our newsletter and other marketing emails. If you ask us to unsubscribe you from our marketing newsletter and emails, we will remove your details immediately.

2.4 Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- a) The right to request a copy of the personal data which we hold about you;
- b) The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- c) The right to request your personal data is erased where it is no longer necessary to retain such data;
- d) The right to object to direct marketing.

2.6 Transfer of Data Abroad

We do not transfer your personal data outside the EU. We use a cloud based marketing platform located in the US to hold your data and information about their compliance with GDPR can be found [here](#).

3. Customer Data

3.1 The purpose of processing your personal data

We use your personal data for the following purposes:

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) Managing our relationship with you	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Contract – processing necessary for the performance of our contract with you
2) Providing proposals for specified projects	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Contract – processing necessary to take steps to enter into a contract with you

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
3) Business analytics	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Legitimate interest – to analyse long term performance of contract and succession management
4) Legal disputes	Name, company, position title, company address, company telephone number, company mobile phone number, company email address	Legitimate interest – defence in the event of legal disputes

3.2 The purpose of processing your special category personal data

We do not process any special category personal data for marketing purposes.

3.3 How long we keep your personal data

We keep your personal data for as long as you would like to subscribe to our newsletter and other marketing emails. If you ask us to unsubscribe you from our marketing newsletter and emails, we will remove your details immediately.

3.4 Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- e) The right to request a copy of the personal data which we hold about you;
- f) The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- g) The right to request your personal data is erased where it is no longer necessary to retain such data;
- h) The right to object to direct marketing.

3.5 Transfer of Data Abroad

We do not transfer your personal data outside the EU. We use a cloud based CRM platform located in the US to hold your data and information about their compliance with GDPR can be found [here](#).

4. Data Processing for Software as a Service (SaaS)

4.1 The purpose of processing your personal data

We process your personal data to provide our products on a Software as a Service (SaaS) basis for the following purposes:

All products:

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) To set up and administer your system users	User name, user ID, user location	Contract – processing necessary for the performance of our contract with you
2) To provide back up and business continuity facilities	User name, user ID, user location	Contract – processing necessary to take steps to enter into a contract with you

Product: FiNDnet Billing

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) To produce invoices from service schedules	Customer name, company, address, service provision	Contract – processing necessary for the performance of our contract with you
2) To provide back up and business continuity facilities	Customer name, company, address, service provision	Contract – processing necessary to take steps to enter into a contract with you

Product: FiNDnet Demand Planning

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) To calculate resource requirements from schedules	Resource type, name, skillset, availability	Contract – processing necessary for the performance of our contract with you
2) To provide back up and business continuity facilities	Resource type, resources skillset, resource availability	Contract – processing necessary to take steps to enter into a contract with you

Product: Local DCS (L-DCS), Backup DCS (B-DCS)

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
1) To provide flight specific check-in functionality	Passenger name list (PNL), ticket number, flight number, passenger name, first night address (pax travelling to USA), passport number, date of birth	Contract – processing necessary for the performance of our contract with you
2) To provide passenger identity information for international border agencies	Passenger name, first night address (pax travelling to USA), passport number and date of birth	Contract – processing necessary to take steps to enter into a contract with you

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Lawful basis</u>
3) To provide back up and business continuity facilities	Passenger name list (PNL), ticket number, flight number, passenger name, first night address (pax travelling to USA), passport number, date of birth	Contract – processing necessary to take steps to enter into a contract with you

4.2 The purpose of processing your special category personal data

We process your special category personal data to provide our products on a Software as a Service (SaaS) basis for the following purposes:

FiNDnet Services:

<u>Purpose of processing</u>	<u>Type of personal data</u>	<u>Additional lawful basis</u>
1) To provide special service requests	Gender, requirement to provide assistance related to health or physical limitation, meals options related to health requirement or religious or philosophical beliefs	Contract; Carried out in the course of its legitimate activities
2) To provide transit information related to minors	Name, age, contact number for unaccompanied minors	Contract; Carried out in the course of its legitimate activities
3) To provide back up and business continuity facilities for your product	Gender, requirement to provide assistance related to health or physical limitation, meals options related to health requirement or religious or philosophical beliefs Name, age, contact number for unaccompanied minors	Contract; Carried out in the course of its legitimate activities

4.3 How long we keep your personal data

We keep your personal data for as long as you would like to subscribe to our newsletter and other marketing emails. If you ask us to unsubscribe you from our marketing newsletter and emails, we will remove your details immediately.

4.4 Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- a) The right to request a copy of the personal data which we hold about you;
- b) The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- c) The right to request your personal data is erased where it is no longer necessary to retain such data;
- d) The right to object to direct marketing.

4.5 Transfer of Data Abroad

Where we are providing services which require transfer of your data to a relevant border agency, your data is always encrypted.

5. General Information

5.1 Sharing your personal data

We do not share or sell on your personal data.

5.2 Automated Decision Making

We do not use any form of automated decision making in our business.

5.3 Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

5.4 Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

5.5 How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact Damarel and ask for our data representative on +44 1252 783787.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office in the UK on +44 (0) 3031 231 113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.