

DATA PROTECTION PRIVACY POLICY

Software Data Protection Privacy Policy and Security Statement

Foundations® and CHS Engineering Services Ltd.

This policy was last updated in December 2013.

1. Who we are

- 1.1. We are an Engineering company operating a number of services including Foundations® (Fixed Asset Management software solution), Condition Monitoring, Engineering Consultancy, Spares Management and Engineering Audit and Inspection.
- 1.2. The terms "we", "us" and "our" used in this Data Protection Privacy Policy & Security Statement refers to CHS Engineering Services Ltd., a company registered in England & Wales under 05148643 whose registered office is at Kensal House, 77 Springfield Road, Chelmsford, CM2 6JG ("Company").
- 1.3. We understand and recognise the importance of safeguarding the personal information of our customers, and to show our commitment, we have formulated this Data Protection Privacy Policy and Security Statement to reflect our commitment to maintaining the confidentiality of the information we receive via Foundations®.

2. Our privacy commitment

- 2.1. CHS Engineering Services Ltd., the operators of Foundations ("Software") are committed to respecting your privacy and recognising your need for appropriate protection and management of personally identifiable information or other personal information you share with us including any information about you or by which you can be identified, such as your name, address, telephone number, birth date, gender, occupation, etc, ("Personal Information")
- 2.2. The purpose of this Data Protection Privacy Policy and Security Statement is to inform you what Personal Information we may collect from you when you use our Software, how we use and secure such Personal Information, and the choices you have regarding our use of, and your ability to review and correct, the Personal Information.
- 2.3. We make every effort to ensure we protect the Personal Information provided to us. We have set out in this Data Protection Privacy Policy information on how we seek to protect your security and privacy, information generally or specifically in respect of any online activities.

3. Data protection register entry details and legal compliance

- 3.1. CHS Engineering Services Ltd. is registered with the Information Commissioner under the Data Protection Act.
- 3.2. The data processing notification details to the Information Commissioner are under Data Protection Register entry details for registration number Z2478296.
- 3.3. These details can be inspected on the Information Commissioner's website..

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- 3.4. We are committed to protecting the Personal Information we collect from users of the Software and processing such information in accordance with the Data Protection Act 1998 with applicable regulations.
- 3.5. We use such information as set out below in this Policy but generally to enhance your experience of using the Software, allow interactivity and to provide you with the services reflected on our Software that you request from us ("Services").
- 3.6. We also outline in our Security Statement, below, the security measures we take to protect the Personal Information provided to us.

4. What information is collected?

- 4.1. When you subscribe to a Service on the Software we ask you to provide certain information about yourself such as your name, telephone or mobile number, email address etc.
- 4.2. We may also collect certain user information such as information relating to computer location, URL and IP address and domains, your browser type, the country and telephone area code where your computer is located, the areas of our Software that were viewed during your visit, and any search terms that you entered on our Software.
- 4.3. When you access the Services on this Software, we will ask you to input and will collect Personal Information from you. We will treat all your Personal Information as confidential and will keep it on a secure server. We reserve the right to disclose the Personal Information in the circumstances set out in this Data Protection Privacy Policy and Security Statement.
- 4.4. When you use the Software, register and/or subscribe for our Services (or as required) you may have to complete a subscription process including a registration form and provide Personal Information.
- 4.5. We gather this Personal Information to allow us to process your registration, process any requests you may make, administer your contract or relationship with us. We also collect the Personal Information in order to grant you access to the online Services and monitor your usage of our site and Services. The information is also collected for such uses as are expressly set out in this Privacy Policy, whether in connection with the Software, our products or services or our business.

5. Personal information

- 5.1. When you access the Services, the Software may record your details to ensure that we comply with legal and contractual requirements, or are able to contact you, resolve any queries and process your orders to completion.
- 5.2. This data and Personal Information will not be used to send marketing offers or shared with any other business.
- 5.3. Any Personal Information collected via this Software will be held by or on behalf of CHS Engineering Services Ltd. We will only use your Personal Information as is required to provide relevant Services, or as permitted by data protection law, or for any other purposes as requested by or agreed with you.
- 5.4. The Services may include providing you with emails which you have elected to receive following access to the services, keeping you informed by email of any additional services, and complying with our legal requirements. The Personal Information we collect and its use is further detailed below.

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- 5.5. If you have contacted us or submitted queries via email, we will use the information solely to respond to these emails and in relation to the services.

6. Using information about you

- 6.1. Your e-mail information is not shared with other organisations for commercial purposes. We do not partner with or have special relationships with any ad server companies.
- 6.2. We use the Personal Information you provide in connection with the Services and internal purposes, such as confirming and tracking your requests, analysing trends and statistics, and providing you with information from and about the Software or CHS Engineering Services Ltd.
- 6.3. We may contract with third party companies, sub-contractors, service providers, agents or other persons to provide certain services including data management, web development, etc. ("Service Providers"). We call them our Service Providers and we shall be entitled to provide our Service Providers with the information needed for them to perform these services. We also ask our Service Providers to confirm that their privacy practices are consistent with ours.
- 6.4. We may also use aggregate information and statistics for the purposes of monitoring Software usage in order to help us develop the Software and our Services. These statistics will not include information that can be used to identify any individual.

7. Provision of information to third parties

- 7.1. CHS Engineering Services Ltd is bound to keep your Personal Information private. Except as provided in this Privacy Policy, we will not sell, rent or loan your Personal Information to third parties for their marketing purposes.
- 7.2. We will not disclose any Personal Information to third parties unless the disclosure is required or authorised by law, or you have consented to our disclosing your Personal Information, or for other purposes (relating to the primary purpose for collecting that information, including the processing of your personal data or Personal Information by our agents or data processors) that is reasonably expected including the sale or disposal of any part of our business or rights.
- 7.3. If we are requested by the police or any other regulatory, investigatory or government authority to provide your Personal Information and/or other user Information, we are entitled do so in compliance with the law of to facilitate an investigation into suspected unlawful activities.

8. Your consent

- 8.1. By submitting your information on the Software you consent to the use of that information as set out in this Data Protection Privacy Policy. If we change our Data Protection Privacy Policy and Security Statement, we will post the changes on the Software, so that you may be aware of the Personal Information we collect and how we use it at all times.
- 8.2. You agree that you do not object to us contacting you for any of the purposes of processing your services, statistical or survey purposes to improve this Software and its services to you, provision of Software content to you, administration of this Software and where you consent, to notify you of

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services that may be of interest to you. You consent to such contact whether by telephone, e-mail or in writing and you confirm that you do not and will not consider any of the above as being a breach of any of your rights under the Privacy and Electronic Communications (EC Directive) Regulations 2003.

- 8.3. Owing to the global nature of the Internet infrastructure, the Personal Information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding your data and its use as set out in this Data Protection Privacy Policy and Security Statement. However, we have taken the steps outlined above to try to improve the security of your information. By submitting your information you consent to these transfers.
- 8.4. By registering an account with us you accept and confirm that you have read our Terms and Conditions and the Software Data Protection Privacy Policy and Security Statement and that you consent to us collecting and processing your personal information in accordance with this Policy and the Terms and Conditions.

9. Sale of business

- 9.1. If all or part of our business is sold, (whether by sale of shares or assets) or integrated with another business, your details and Personal Information may be disclosed to our advisers and any prospective purchasers or purchasers and their advisers and will be passed on to the new owners of the business.
- 9.2. Following completion of any such sale or transfer, your Personal Information shall be disclosed to and transferred to such new owner or third party.

10. Editing, updating, correcting and deleting information about you

10.1. If you prefer not to receive information from us, or wish to correct your information, please let us know by:

- Email: rachel_smith@chsservices.com
- Phone: +44 (0)1245 496 281
- Mail: CHS Engineering Services Ltd., Unit 18 Waterhouse Business Park, 4 Cromar Way, Chelmsford, Essex, CM1 2GL

11. Policy changes

11.1. From time to time, we may use Personal Information for new, unanticipated uses not previously disclosed in our Data Protection Privacy Policy. If our information practices change at some time in the future we will notify you of these changes and provide you with the ability to opt out of these new uses.

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SECURITY STATEMENT

This is the Security Statement and Policy of CHS Engineering Services Ltd. in compliance with the Data Protection Act 1998 and applicable regulations. The internal procedures of CHS Engineering Services Ltd. are designed to cover the storage, access and disclosure of your Personal Information.

CHS Engineering Services Ltd. is committed to online security. We maintain security measures to protect the sensitive data on our Software and to prevent unauthorised access of customer information that is transmitted to servers. We cannot however guarantee the security of any data sent over the internet. Details of our security policy and measures can be found below.

This Security Statement explains how we store and safeguard the information we collect about you, and procedures that we have in place to safeguard your privacy generally.

- We always use industry-standard **encryption technologies** when transferring and receiving data exchanged with our Software. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from you at our Software.
- Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information, we cannot guarantee or warrant the security of any Personal Information you transmit to or from our Software, and you do so at your own risk. Once we receive your transmission, we will do our best to protect its security on our systems.
- Although the Internet is not a completely secure medium, we have put in place various security procedures as set out in this Security Policy as part of the Data Protection Privacy Policy and Security Statement.

To prevent unauthorised access and maintain the accuracy of our records and data to ensure proper use of information, we have put in place appropriate physical, electronic and managerial procedures to protect, secure and safeguard the personal data and information we collect on or through our Software. The following provisions and arrangements are in place:

1. We have a management and corporate commitment to information security within the organisation and provide clear direction, guidance and responsibilities and procedures in this respect.
2. All employees are briefed on the importance of personal data and security and confidentiality of information obtained.
3. We control physical security in relation to the information and personal data that is contained at our facilities and restrict access to the site, buildings, computer rooms, office desk, technology areas, equipment and other facilities where unauthorised access by people could compromise our security.
4. All proprietary or confidential information, including personal data, is contained or stored on computer and any that is contained and stored on manual files are locked up and secure.
5. We may seek to control access to information and personal data, including existing procedures for authorising and authenticating users as well as software controls for restricting access and techniques for protecting data such as encryption.
6. We monitor and log access so as to assist in detection and investigation of security breaches and any attempted breaches where they occur.

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7. We maintain a business continuity plan as a contingency plan which identifies our business functions and assets (including personal data) which would need to be maintained in the event of disaster and set out the procedures for protecting and restoring them if necessary.
8. Our employees are trained on practical aspects of the Data Protection Act 1998, confidentiality, security systems and we have relevant procedures in place in relation to the obligations under the Data Protection Act 1998. Accordingly, our staff should be aware of information security issues and they are able to contact our Data Protection compliance officer with any issues relating to the Data Protection, Privacy or personal data.
9. In respect of detection and investigation of breaches where they occur, we have in place relevant controls which should alert us to a breach in security. We endeavour to investigate every notified breach of security.
10. The personal data and information held by us are currently stored on a relevant technology system.
11. We are constantly updating our technology to provide you with the maximum practicable level of security.
12. We seek to keep your Personal Information confidential and our security measures are reviewed from time to time.

We are taking and will endeavour to continue to take all reasonable steps in order to protect our information and all personal data obtained by or provided to CHS Engineering Services Ltd. However, CHS Engineering Services Ltd. cannot guarantee the security of any Personal Information or data disclosed to it or collected by it as we have no control over the public or third party network through which Personal Information may be sent to our Software.

Any changes to this policy will be communicated to all Software users.

Data Protection Privacy Policy and Security Statement updated Dec-2013