

## Privacy Statement Aventus Network Services

Version 1.1

Last updated January 2021

Aventus Network Services Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.ventus.io](http://www.ventus.io) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

### Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

#### “Account”

means an account required to access and/or use certain areas and features of OurSite;

#### “Cookie”

means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below

#### “Cookie Law”

means the relevant parts of the Privacy and Electronic Communications(ECDirective) Regulations 2003;

### Information About Us

Our Site is owned and operated by Aventus Network Services Limited with the registered office address Salisbury House, 31 Finsbury Circus, London, England, EC2M 5SQ.

### What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other

websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation

2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can

be directly or indirectly identified in particular by reference to an identifier’. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers

obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

1. The right to be informed about our collection and use of your personal data.

This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.

2. The right to access the personal data we hold about you. Part 13 will tell you how to do this.

3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.

4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.

5. The right to restrict (i.e. prevent) the processing of your personal data.

6. The right to object to us using your personal data for a particular purpose or purposes.

7. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

8. Rights relating to automated decision-making and profiling. For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

9. The right to lodge a complaint with the Information Commissioner's Office ("ICO"). You have the right to submit a complaint to the ICO when you are not satisfied with our response to your complaint or you feel that we have not treated you in accordance with relevant rights under the GDPR. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

10. Exercising your rights, or submitting a complaint to Aventus. For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the

details provided in Clause 15. Please note that we may ask you to verify your identity before responding to such requests. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, please contact us directly.

### What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies and similar technologies and our Cookie Policy <https://www.ventus.io/cookie-declaration>):

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information
- Information about your preferences and interests
- IP address
- Web browser type and version
- Operating system
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

### How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for one or more

of the following purposes:

- Providing and managing your Account
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying our products and/or services to you. Your personal details are
- required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to emails or calls from
- you.
- Supplying you with information by email and/or post that you have opted-in to  
(you may unsubscribe or opt-out at any time by clicking on an unsubscribe link  
within an email we send you or using the details in Part 15.

In certain cases we may also use your personal data for marketing purposes

which may include contacting you by email, telephone, text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam and you will always have the opportunity to opt-out.

Third Parties whose content appears on Our Site may place third-party Cookies on your device, please refer to our cookie statement to learn more about the use of cookies on Our Site.

For what duration will you retain personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. [How and Where Do You Store or Transfer My Personal Data?](#)

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We share your data within the group of companies of which we are part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the European Commission.]

Please contact us using the details below in Part 15 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

**Do You Share My Personal Data?** We may share your personal data with other companies in our group for the purpose of providing you with, or informing you about, our products and services. This includes subsidiaries and our holding company and its subsidiaries. We may sometimes contract with third parties to supply certain products and/or services. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold. If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9. If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### How Can I Control My Personal Data?

In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via OurSite, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your Account).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

### Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies. For more information, see Part 14 and our Cookie Policy.

### How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request". All subject access requests should be made in writing and sent to the email address shown in Part 15. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding. We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### How Do I Contact Aventus?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please email us at [dpo@aventus.io](mailto:dpo@aventus.io).

## Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.