



## **EOS Data Protection Policy**

Equipment Optimization Solutions Ltd. (EOS) is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. EOS has a robust and effective data protection program in place which complies with existing law and abides by commonly accepted data protection principles.

### **1. Data protection principles**

EOS processes data in accordance with its responsibilities under the GDPR, and specifically in compliance with Article 5 of the Regulation, requiring that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are 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 personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

### **2. General provisions**

- a. This policy applies to all personal data processed by EOS.
- b. This policy is reviewed at least annually.

### **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, EOS maintains a register of processes and systems used to manage personal information.
- b. The Register of Systems is reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to EOS shall be dealt with in a timely manner.



#### **4. Information We Collect**

The personal information EOS may collect includes:

- a) How you use or visit our websites or applications.
- b) Contact, billing, and other information you provide, such as your name, email address, mailing address, contact telephone numbers.
- c) Credentials such as your passwords, password hints, and similar security information used for authentication and My Profile access.
- d) Web form information you provide in our web forms (forms that you choose to complete will indicate whether the information requested is mandatory or voluntary).
- e) User activity history.
- f) Cookie and tracking information such as IP address, device identifier, location data, browser type and language, access times, the Uniform Resource Locator (URL), other unique identifiers, and other technical data that may uniquely identify your device, system or browser.
- g) Browse history information about the EOS pages you visit.
- h) Error reports and performance information of the products and any problems you experience, including error reports.
- i) Troubleshooting and help information when you contact EOS for technical support or customer support services, phone conversations, or chat sessions with our representatives which may be monitored and recorded.

#### **5. How We Use And Share Your Information**

We use and information to:

- a) Deliver and maintain our products and services.
- b) Establish and maintain your account.
- c) Provide account related services and information.
- d) Help you with customer service and technical support issues or questions.
- e) Help us improve our products and services.
- f) Provide you with marketing and promotional communications, and deliver targeted and relevant advertising and relevant offers to you, which includes better predicting content and marketing offers that may interest you.
- g) Authenticate you.
- h) Detect and prevent fraud.
- i) Manage and protect our networks, services, and customers.
- j) Meet our legal obligations and doing research.

#### **6. Lawful purposes**

- a. All data processed by EOS must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent is kept with the personal data.
- c. EOS maintains records of a user's option to revoke their consent to ensure that such revocation is reflected accurately in EOS's systems.



#### **7. Data minimization**

- a. EOS shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

#### **8. Accuracy**

- a. EOS shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

#### **9. Archiving / Removal**

- a. To ensure that personal data is kept for no longer than necessary, EOS provides an archiving policy for each area in which personal data is processed and reviews this process annually.
- b. The archiving policy considers what data should/must be retained, for how long, and why.

#### **10. Security**

- a. EOS ensures that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- c. When personal data is deleted it is done such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

#### **11. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, EOS shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to relevant parties and

END OF POLICY