

AIEVE

PRIVACY POLICY AIEVE

**AIEVE LTD
PUMA WAY
COVENTRY, CV1 2TT**

01/05/2018

INTRODUCTION

- This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you manage your portfolio, providing you with a service, using your data to respond to your enquiries or you are simply visiting our website.
- It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- This Privacy Policy applies to the personal data of our clients, website visitors and other people whom may contact us.
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR")), the company responsible for your personal data is AIEVE (or "us").
- It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

SHORT FORM "AT A GLANCE" SECTION

What kind of personal data do we collect?

- **CLIENT DATA:** If you are an AIEVE customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: managing your portfolio and/or notifying you of content published by AIEVE which is likely to be relevant and useful to you.
- **WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Other items may simply be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

How do we collect your personal data?

- **CLIENT DATA:** There are two main ways in which we collect your personal data:
 - Directly from you through the sign-in process
 - From third parties and other limited sources
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- **WEBSITE USERS:** We collect your data automatically when you visit our website, in line with cookie settings in your browser. We will also collect data from your navigation on the website.

How do we use your personal data?

- CLIENT DATA: The main reason for using information about clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. Where we have legitimate business interests:
 - To respond to customer enquiries and complaints
 - To manage payment schedules, credit levels and debt collection
 - To understand customer behaviour, so that we can provide you with products and services that are best suited to your requirements
 - For management information (MI) reporting purposes, to help us continually improve our offering to our customers
 - To sell forecasts to you
 - To provide you a personalized saving service. The more information we have, the more bespoke we can make our service
- WEBSITE USERS: We use your data to help us to improve your experience of using our website. If you are also a client of AIEVE, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.
- Please note that communications to and from AIEVE's Staff including emails may be reviewed as part of internal or external investigations or litigation.

Who do we share your personal data with?

- CLIENT DATA: We will share your data: (i) to ensure that we are giving you the right information to help you manage your portfolio; (ii) providing you a personalized saving service. Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.
- WEBSITE USERS: Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

How do we safeguard your personal data?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

How long do we keep your personal data for?

- We keep your personal data as long as your account is active. When you delete your account, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

How can you access, amend or take back the personal data that you have given to us?

- Even if we already hold your personal data, you still have various rights in relation to it. To have more information about these, please go to your account in the GDPR section or contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for profiling), or consent to market to you, you may withdraw your consent at any time.
- Data Subject Access Requests (DSAR): Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if

certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

- Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.
- If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example AIEVE newsletters) by clicking the unsubscribe link in the email, or by updating your preferences through our preference centre on the AIEVE website (by signing into your account or entering your email address).

How do we store and transfer your data internationally?

- AIEVE is a global organisation however all the data is stored in EU and we are not intend to transfer or store your data outside of the EU.

Who is responsible for processing your personal data on the AIEVE website?

- AIEVE controls the processing of personal data on its service(s) and website(s).

What are cookies and how do we use them?

- A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.
- If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How to reject cookies

- If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings
- Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

LONG FORM DETAILED SECTIONS

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the information we may collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

- **CLIENT DATA:** The data we collect about clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation to enable us to ensure that our relationship runs smoothly. If we need any additional personal data for any reason, we will let you know.
- **WEBSITE USERS** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, we will collect any information that you provide to us, for example your name and contact details.

HOW DO WE COLLECT YOUR PERSONAL DATA?

CLIENT DATA We collect Client personal data in three ways:

1. Personal data that we receive directly from you

- We both share the same goal – to make sure that you have the best savings for your portfolio. We will receive data directly from you in two ways:
 - Where you contact us proactively, usually by email; and/or
 - Where we contact you, usually by email, or through our consultants' business development activities more generally.

2. Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:
 - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
 - From delegate lists at relevant events; and
 - From other limited sources and third parties.

3. Personal data we collect via our website

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

WEBSITE USERS: When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

- We collect your data automatically, in line with cookie settings in your browser. If you are also a client of AIEVE, we may use data from your use of our websites to enhance other aspects of our communications with or service to you.

HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

CLIENT DATA:

- The main reason for using information about clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. Where we have legitimate business interests:
 - To respond to customer enquiries and complaints
 - To manage payment schedules, credit levels and debt collection
 - To understand customer behaviour, so that we can provide you with products and services that are best suited to your requirements
 - For management information (MI) reporting purposes, to help us continually improve our offering to our customers
 - To sell forecasts to you
 - To provide you a personalized saving service. The more information we have, the more bespoke we can make our service
- Marketing Activities
 - Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials to a corporate postal or email address.
 - If you are not happy about this, you have the right to opt out of receiving marketing materials from us.
 - Please note that we operate in UK jurisdictions, we comply with additional local law requirements regarding marketing activities.
- To help us to establish, exercise or defend legal claims
 - In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

WEBSITE USERS: We use your data to help us to improve your experience of using our website, for example by analysing your recent activities to help us to offer advice to you that we think you'll be interested in.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- If AIEVE merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.
- If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- We keep your personal data as long as your account is active. When you delete your account, we will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).
- For those clients whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for as long as you are a customer of our service(s).
- When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

- To get in touch about these rights, go to your account in the section GDPR or please contact us. We will seek to deal with your request without undue delay, and in any event within 30 days (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
- The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users and Clients. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
 - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
 - we are processing your data for the establishment, exercise or defence of a legal claim.
 - If your objection relates to direct marketing, we must act on your objection by ceasing this activity.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.
- Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

- We comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.
- Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
 - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
 - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
 - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
 - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
 - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.
 - We would only be entitled to refuse to comply with your request for one of the following reasons:
 - to exercise the right of freedom of expression and information;
 - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
 - for archival, research or statistical purposes; or
 - to exercise or defend a legal claim.
 - When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.
- Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the

establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

- The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
 - where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
 - where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
 - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
 - where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
- Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
- Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your AIEVE account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without

any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.
- You may ask to unsubscribe from AIEVE newsletter at any time.
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE AIEVE WEBSITE?

- AIEVE controls the processing of personal data on its website(s).
- If you have any comments or suggestions concerning this Privacy Policy please contact us. We take privacy seriously so we'll get back to you as soon as possible.

HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

- So you want to know more about how we store and transfer your data inside of the European Economic Area. In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:
 - between and within AIEVE entities;
 - to third parties (such as advisors or other suppliers to the AIEVE business);
 - to a cloud-based storage provider; and
 - to other third parties.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.
- Your data won't be stored or transferred outside of the EU.

COOKIES POLICY

What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the AIEVE website.

How do we use cookies?

- To track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and
- Cookies are either:
 - Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
 - Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).
- Cookies can also be categorised as follows:
 - Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
 - Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- **Personalisation cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

OUR LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

- Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."
- We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis.

CLIENT DATA:

- To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered customers and forecasts. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

CONSENT

- In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.
- Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:
 - you have to give us your consent freely, without us putting you under any type of pressure;
 - you have to know what you are consenting to – so we'll make sure we give you enough information;

- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- We will keep records of the consents that you have given in this way.
- We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the saving services we provide as long as you do not actively opt-out from these communications.
- As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time.

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

- Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

ANNEX 1 – HOW TO CONTACT US

Country in which you use AIEVE' services or supply AIEVE with services: UK

AIEVE entity responsible for processing the personal data of clients and the personal data of Website Users: AIEVE Ltd

How you can get in touch with us:

- to access, amend or take back the personal data that you have given to us;
- if you suspect any misuse or loss of or unauthorised access to your personal information;
- to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);
- with any comments or suggestions concerning this Privacy Policy,
- you can send an email to: support@aieve.io.
- Alternatively, you can write to us at the following address: AIEVE LTD, Puma Way, Coventry, United Kingdom, CV1 2TT
- How you can get in touch with us to update your marketing preferences:
 - You can do this by connecting to your account and go to the preference section.
 - Alternatively you can click on the unsubscribe link in any marketing e-mail we send to you.

GLOSSARY

- *Clients* - while it speaks for itself, this category covers our customers, clients, and others to whom AIEVE provides services in the course of its business.
- *Delete* – while we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or staff.
- *General Data Protection Regulation (GDPR)* – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.
- *Staff* – includes employees and interns engaged directly in the business of AIEVE (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to AIEVE (even though they are not classed as employees). For these purposes we also include employees of AIEVE who are engaged to work on clients' premises.
- *Website Users* - any individual who accesses any of the AIEVE websites.