



## Introduction

EM Topco Limited and all its subsidiaries (“Element” or “the Group”) are committed to complying with internationally recognized standards of privacy protection and applicable data privacy and security laws in the countries in which we operate. Element’s head office is at 3rd Floor Davidson Building, 5 Southampton Street, London, United Kingdom, WC2E 7HA. In this notice, references to “we”, “us” or “our” are references to Element.

This Global Privacy Notice applies to all personal information we collect, use and process about you when you purchase products from us or use our services.

## Who is collecting Personal Information?

The Group comprises of multiple legal entities acting as separate data controllers, responsible for processing personal information in connection with our business. Please see our [‘Element Legal Entities Processing Personal Information’](#) PDF for further details on the companies within the group processing personal information.

## What Personal Information we may collect

We may collect and process your personal information in connection with our products or services at the start of, and for the duration of, your relationship with us and beyond. We will limit the collection and processing of your personal information to information necessary to achieve one or more legitimate purposes, as identified in this notice.

We will only process sensitive personal information where we’ve obtained your explicit consent or are otherwise lawfully permitted to do so. Where you have provided consent for us to process your sensitive personal information, you can withdraw that consent at any time by contacting us.

We may collect the following categories of personal information about you:

Personal Information Category	Personal Information Collected
Identity information	First name, middle name, last name, alias, username or similar identifier, marital status, title, date of birth, gender, state, or national identification number (such as a driver license, national insurance number or social security number), passport number, internet protocol (IP) address, signature
Sensitive information	Racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation, Social Security number, driver’s license or state ID number, passport number
Demographic information	Age, gender, race, nationality, ethnicity, ethnic origin, citizenship, marital status, income, education, religion, citizenship, physical or mental disability, veteran or military status

Contact information

Contractual information	Personal information (as outlined in the other categories) collected as part of the products and services we provide to you.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Financial information	Bank account, payment card details, invoice amounts, payment amount, outstanding balances.
Internet or another similar network activity information	Internet Protocol (IP) address, smart device information, location coordinates, site visits, browsing history,

- **Through interactions with you** when you enquired about or purchased products or services from us, requested information or assistance from us, registered to attend or attended one of our events, used our website or client portal or applied for a job with us, or when you participate in product reviews, pilots, feedback sessions or similar
- **Through activity on our website** such as submissions from you via our website or website usage details collected automatically
- **Through interactions with our clients** due to your role in your organisation
- **Through interactions with third parties** such as industry, trade or regulatory bodies
- **From third party service providers** acting on our behalf in connection with the products and services we provide
- **From publicly available sources** including social media (LinkedIn, Facebook, Twitter), your organisation's website, the press, the electoral register, company registers and online search engines
- **From automated technologies or interactions that collect technical data about your equipment, browsing actions and patterns** such as cookies, server logs or other similar technologies

### Purpose of processing your Personal Information

We will only use and share your personal information where it is necessary for us to carry out our lawful business activities. Your personal information may be shared with and processed by other Element group companies. Element collects and processes your personal information for purposes detailed below:

Reason for Processing Personal Information	Purpose of Processing Personal Information
To fulfil our <b>contractual obligations</b>	<ul style="list-style-type: none"> <li>• To provide our products or services to you</li> <li>• For you to provide your products or services to us</li> <li>• To consider and process any application you may make to us, as a candidate for a job</li> </ul>
For our <b>legitimate interest</b> , as a commercial organisation, provided our use is proportionate and respects your privacy rights	<ul style="list-style-type: none"> <li>• To provide you with information on our products or services</li> <li>• To respond to a query, we have received from you</li> <li>• To review and improve our products and services and to help and support you in using our products and services</li> <li>• To confirm, update and improve our customer records</li> <li>• To review and develop your relationship with us</li> <li>• To inform you about improvements to our website</li> </ul>





corresponding “transfer impact assessment” (“TIA”) and supplementary measures, or (3) an Article 49 exemption to the rules such as explicit consent that allows us to perform these transfers.

Following the EU’s Adequacy Decision granted on 10 July 2023, the EU-US Data Privacy Framework (DPF), allows self-certified US businesses to freely receive personal data from the EEA without further measures. This means that for some transfers to the US, SCCs, TIAs and supplementary measures will no longer be required.

## **How we protect your Personal**

### **Links to other websites**

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We do not control the content, the security,





privacy and security laws, and state attorney general offices are responsible for overseeing these laws. State attorney general office contact details can be found at <https://www.usa.gov/state-attorney-general>.

## Contact us

If you would like to speak to us about data protection you can do so by post or email using the details below:

Email: [privacy@element.com](mailto:privacy@element.com)

Postal address:

