

# EIMS Data Privacy Policy

## Who We Are

EIMS provides outsourced services to high technology vendors to help them build their businesses through effective lifecycle management of new and existing customers and channel partners.

Our headquarters are in the UK, and we have operations in the U.S., Asia Pacific, and mainland Europe.

EIMS is registered with the UK Information Commissioners Office (ICO) as a Data Controller (registration: ZA290698). The ICO <https://ico.org.uk/> is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

## What Information We Collect

To manage our own business we process employee, client, and business partner (e.g., supplier) data. We also collect and process data on behalf of our clients relating to their customers, business partners, and target accounts in defined markets. Client data only relates to the campaigns EIMS delivers on their behalf and is restricted to the business-to-business market. We do not collect data relating to consumers or activities of people in a personal capacity.

We obtain business contact data (name, title, contact information [e.g., email, phone number and postal address, company name, size of business, industry, location]) from reputable agencies, public sources, our clients, and through our own research. Wherever possible originating data sources are recorded.

Information and policies specific to information collected on our website ([EIMS.biz](https://www.eims.biz)) can be seen at the following [link](#)

## Why We Process Personal Data (Purpose)

To manage our own business we process employee, client (existing and prospective) and supplier data to perform Human Resource Management and Payroll duties and to manage relationships, projects, and billing.

On behalf of clients, we manage and process personal data to perform business-to-business CLM (Customer Lifecycle Management) tasks such as Marketing, Sales, and post-sales Customer Service and support.

Unless we specify otherwise the legal grounds for our collection and processing of personal data is the Legitimate Business Interest of EIMS or our clients. We review the legitimacy of those interests on a case-by-case basis considering the rights and interests of individuals whose data we hold. Our clients will normally define the legal ground(s) for processing data where EIMS provides services to them as a processor. EIMS assumes obligations to protect and manage your personal data.

## What We Do With Personal Data

If we ask for your personal data, we will make it clear why we are asking for it. For instance, we may need your email to send you something you have requested or a phone number if you have asked to be contacted.

When acting as a data controller will not provide your personal information to any third parties for the purpose of direct marketing without your express consent. When acting as processor on behalf of a client we will share your personal information with that client to the extent of our contractual and statutory obligations.

**International Data Transfers** - We may on occasion transfer data between any of the countries in which we or our clients operate in a role as either controller or to fulfil our contractual obligations as a data processor.

EIMS will not use your personal data in any automated decision-making techniques that could result in decisions that might affect you.

We may also share personal data with other organisations where there is a contractual obligation to fulfil aspects of its processing, for example payroll suppliers for our own employee benefits or service providers who manage aspects of our technical infrastructure.

## How Long Do We Keep Personal Data?

We only keep data for the period for which we see it as relevant. This would typically be for as long as the individual occupies the professional position that we have a legitimate interest in. This could be years in some cases, but our processes seek to update and refresh data to ensure that it remains accurate and relevant if held for a significant period.

Data held on behalf of clients where EIMS acts as a data processor is subject to specific client agreements and will typically be returned to the client at the end of an engagement and cease to be processed by EIMS.

## How Do We Look After It?

We will take reasonable technical and organisational precautions to prevent the loss, misuse, or unauthorised alteration of your personal information.

We will store any personal information you provide on our secure servers in the UK.

## Your Rights

EIMS recognises your rights as defined in the General Data Protection Regulation (GDPR), these can be reviewed [here](#). We will always seek to uphold those rights and should you wish to exercise any of these, please complete the form in the '[Your Rights](#)' section in our [Website privacy policy](#) with the relevant select as shown below

## Your Rights cont.

Data Subject Right...	How EIMS satisfies your rights
... To be Informed	Read our Data Privacy Policy which details all aspects of how we may process your data. If you have any questions, email us at <a href="mailto:dataprivacy@eims.biz">dataprivacy@eims.biz</a>
... to Rectification	If any data we hold about you needs correcting, then complete the form selecting the option: <i>'Update Personal Details (Right to Rectification)'</i>
... to Object	For us to stop communicating with you, complete the form selecting the option: <i>'Opt out (Right to Object)'</i> <small>N.B if you chose this option, we would stop communicating with you until you choose to re-subscribe to communications.</small>
... to Erasure	For us to delete the personal data that we currently hold about you, complete the form selecting the option: <i>'Delete Personal Details (Right of Erasure)'</i> <small>N.B - when your data is deleted it may not preclude us from unknowingly re-acquiring it from other sources at a future point in time</small>
... of Access	If you would like us to send you the personal data that we hold for you, complete the online form selecting the option: <i>'Get my Data (Right of Access)'</i>
... to data portability	Where we provide your personal data to you, we will do so in a commonly used format, for a specific request, complete the form by selecting: <i>'Extract Data in Specific Format (Right to Data Portability)'</i>
... of Restriction of processing	Should there be any dispute about processing your data and you would like to pause processing until the dispute is resolved, complete the form selecting: <i>'Put on Hold (Right to Restrict processing)'</i>
... in Relation to Automated Decision Making and Profiling	EIMS does not use any form of Automated decision making; Should you have any queries about this, email us at <a href="mailto:dataprivacy@eims.biz">dataprivacy@eims.biz</a>

EIMS recognises your right to lodge a complaint with a supervisory authority. EIMS is registered with the UK ICO, and you can access their web site from this [link](#).

## EIMS USA Inc. Data Privacy Framework (DPF)

EIMS USA Inc. based in Miami, FL is registered under and complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce and operates to our global standard data privacy policy. Notices specific to our participation in the EU-U.S. DPF are as follows:

- EIMS USA Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce. EIMS USA Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) and to view our certification, please visit <https://www.dataprivacyframework.gov/>.
- EIMS USA Inc. processes the [types of data](#) described in the main body of this data privacy policy and confirms its commitment to subject all personal data received from the EU/UK to those principles in reliance on the DPF.
- The purposes for which we collect and use personal information are described [here](#)
- EU/UK individuals with inquiries or complaints under DPF should first contact EIMS USA Inc. by completing the 'Data Enquiry Form' at the following link: '[Your Rights](#)' or contact us by post to Data Privacy Officer, Granville Chambers, 21 Richmond Hill, Bournemouth, BH2 6BJ, Dorset, UK. Completion of the online form or writing to us will enable you to exercise your rights and access our internal complaints mechanism.
- EIMS USA Inc. and its affiliates will not disclose your personal data to any third party except where required by contractual or statutory obligation or to an organisation that processes data under our instruction and subject to a processor agreement that protects you and extends data privacy obligations to that sub-processor.
- EIMS USA Inc. participation in DPF recognises the rights of data subjects described in this privacy policy in the section '[Your Rights](#)' which describes how to request access to any personal data that we may hold about you and exercise all of your rights in relation to that data. Your rights include but are not limited to, the right to 'object' (opt out) to the processing of your personal data. You can choose to exercise all rights by completing the simple form at this [link](#). Your data will not be shared with any third party other than as described below or used for any purpose other than as declared in this policy.
- EIMS USA Inc. has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioners Office (ICO) with regards to unresolved DPF complaints concerning data transferred from the EU/UK.
- EIMS USA Inc. acknowledges that under DPF it is subject to:
  - the investigatory and enforcement powers of the Federal Trade Commission (FTC), the U.S. Department of Transportation or any other U.S. authorized statutory body,
  - the possibility, under certain conditions, for the individual (data subject) to invoke binding arbitration,
  - the requirement to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, and
  - its liability in cases of onward transfers to third parties.