

OVERVIEW

This Website Privacy Policy ("Privacy Policy") relates to the Websites of SYSTRA Limited, the UK and Ireland subsidiary companies of SYSTRA Group.

We take your privacy seriously. This policy covers all data that is shared by a visitor with Us whether directly via www.systra.com/uk or www.systra.com/ireland ("Website") or by email. This policy provides an explanation as to what happens to any personal data that you share with us, or that We collect from you either directly via this Website or email.

Certain businesses are required under the data protection act to have a data controller. For the purpose of the EU's General Data Protection Act Regulation (GDPR) and UK GDPR, Our data protection officer ("DPO") can be contacted via email at dpo_ukir@systra.com. This Website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. The Websites for UK and Ireland respectively comply with all UK and Republic of Ireland national laws and requirements for user privacy.

We will start to apply this Privacy Policy upon your first use of the Website and your use of the Website is conditional upon you accepting this Privacy Policy. By using this Website, you are agreeing to the terms of this Privacy Policy, and you consent to the processing of your Personal Information according to this Privacy Policy by Us or by third parties with whom We have a relationship.

Please also see [Our Cookie Policy](#) ("Cookie Policy") which explains how We use cookies and similar technologies to recognise you when you visit Our Website.

DEFINITIONS AND INTERPRETATION

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

"personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 and associated regulations; and

"We/Us/Our" means SYSTRA Limited, a limited company registered in England under company number 03383212, whose registered address is 3rd floor, 1 Carey Lane, London EC2V 8AE and also in the Republic of Ireland under company number 904799, whose registered address is 2nd Floor, Riverview House, 21-23 City Quay, Dublin 2, Dublin.

The Privacy Policy for www.systra.com/uk and www.systra.com/ireland ("Website") operates within the overall Website Privacy Policy for the www.systra.com domain as defined by [SYSTRA Group](#). SYSTRA Group's Privacy Policy can be viewed here: [Privacy Policy](#).

PERSONAL DATA

In the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"...any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

INFORMATION WE COLLECT

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or Our products and services, when you participate in activities on the Website, or otherwise when you contact us.

In operating Our Website, We may collect and process the following data about you:

- Details of your visits to Our Website and the resources that you access including, but not limited to, traffic data, location data, weblog statistics and other communication data.
- Information that you provide by filling in forms on Our Website. The personal information we collect may include the following:
 - names
 - phone numbers
 - email addresses
 - job titles
 - organisation
 - contact or authentication data
- Information provided to Us when you communicate with Us for any reason.
- We do not process sensitive information.

We automatically collect certain information when you visit, use, or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use Our Website, and other technical information. This information is primarily needed to maintain the security and operation of Our Website and for Our internal analytics and reporting purposes.

Like many businesses, we also collect information through opt-in cookies and similar technologies. You can find out more about this in [Our Cookie Policy](#).

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information Our servers automatically collect when you access or use Our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and information about your activity (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
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- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
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- **Location Data.** We collect location data such as information about your device's general location. How much information we collect depends on the type and settings of the device you use to access the Website. You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device.



HOW WE USE YOUR PERSONAL DATA

We process your information to provide, improve, and administer Our Website, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your personal information for a variety of reasons, depending on how you interact with Our Website, including:

- To respond to user inquiries/offer support to users.
- To deliver and facilitate delivery of services to Our users. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. To provide you with information requested from Us relating to Our Website and to provide information on other services which We feel may be of interest to you if you have consented to receive such information.
- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of Our Website.
- To send you marketing and promotional communications. We may process the personal information you send to us for Our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of Our marketing emails at any time.
- To deliver targeted advertising to you. We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more. For more information see [Our Cookie Policy](#).
- To identify usage trends. We may process information about how you use Our Website to better understand how they are being used so we can improve them
- To determine the effectiveness of Our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- To comply with Our legal obligations.
- To notify you about any changes to Our Website, such as improvements or service changes, that may affect Our service.

We collect the e-mail addresses of those who communicate with Us via e-mail, aggregate information on what pages users access or visit, and information volunteered by the user (such as survey information and/or opted into such as a newsletter subscription).

The information We collect is used to improve the content of Our Web pages and the quality of Our service, and not shared with, or sold, to other organisations for commercial purposes, except to provide products or services where you've requested, when We have your permission.

We are committed to ensuring the information We collect and use is appropriate for the purpose, and does not constitute an invasion or your privacy.

You have the right to withdraw your consent to Us using your personal data at any time, and to request We delete any saved data entirely from Our stored records.

WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

We only process your personal information when We believe it is necessary and We have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil Our contractual obligations, to protect your rights, or to fulfil Our legitimate business interests.



The General Data Protection Regulation (GDPR) and UK GDPR require Us to explain the valid legal bases We rely on in order to process your personal information, these are:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when We believe it is necessary to fulfil Our contractual obligations to you, including providing Our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve Our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, We may process your personal information for some of the purposes described in order to
 - Send users information about Our products and services
 - Develop and display personalised and relevant advertising content for Our users
 - Analyse how Our Websites are used so We can improve them to engage and retain users
 - Support Our marketing activities
 - Understand how Our users use Our products and services so We can improve user experience
- **Legal Obligations.** We may process your information where We believe it is necessary for compliance with Our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend Our legal rights, or disclose your information as evidence in litigation in which We are involved.
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- **Vital Interests.** We may process your information where We believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, We are generally the 'data controller' under European data protection laws of the personal information described in this Privacy Policy, since We determine the means and/or purposes of the data processing We perform.

This Privacy Policy does not apply to the personal information We process as a 'data processor' on behalf of Our clients and partners. In those situations, the client or partner that We provide services to and with whom We have entered into a data processing agreement is the 'data controller' responsible for your personal information, and We merely process your information on their behalf in accordance with your instructions. If you want to know more about Our clients' and partner privacy practices, you should read their privacy policies and direct any questions you have to them.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

We may pass your personal data to third-party service providers contracted to or associated with Our company in the course of dealing with you. Any third parties that We may share your personal data with are obliged to keep your details securely, and to use them only to respond to requests, questions, service requirements, complaints, etc. on Our behalf in relation to the service We provide to you.

When a third-party no longer needs your personal data to fulfil this service, they will dispose of the details in line with Our company's [data protection policies and procedures](#). If We wish to pass your sensitive personal data to a third party We will only do so once We have obtained your explicit consent, unless We are legally required to do otherwise.

The third parties We may share personal information with are as follows:

- **Advertising and Lead Generation**
Facebook Audience Network
- **Content Optimisation**
MailChimp widget plugin and YouTube video embed
- **Retargeting Platforms**
LinkedIn Website Retargeting, Google Ads Remarketing and Facebook Remarketing
- **Social Media Sharing and Advertising**
LinkedIn advertising, Instagram advertising and Facebook advertising
- **User Account Registration and Authentication**
MailChimp OAuth2
- **Web and Mobile Analytics**
Facebook Ads conversion tracking, Google Ads and Google Tag Manager
- **Web & Mobile Analytics**
Matomo Analytics
- **Website Performance Monitoring**
Microsoft Clarity

We may also need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of Our business to another company.

STORING YOUR PERSONAL DATA

We will process (collect, store and use) the information you provide in a manner compatible with the Data Protection Act 1998 and associated regulations (GDPR). Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address).

We will do Our utmost to keep your information accurate and up-to-date and not keep it for longer than is necessary as described above, and/or for as long as We have your permission to keep it. We are required to retain information in accordance with the law, such as information needed for tax and audit purposes.

How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on the individual business needs.

The transmission of information via the internet is not completely secure and therefore We cannot guarantee the security of data sent to Us electronically and the transmission of such data is entirely at your own risk.

EXTERNAL LINKS

The Website may contain links to third party Websites. Please note that We have no control over how your data is collected, stored, or used by third party Websites and We advise you to check the privacy policies of any such Websites before providing any data to them. We do not accept any responsibility or liability for their policies whatsoever as We have no control over them. Users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this Website.

YOUR LEGAL RIGHTS

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws and may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe We are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

As a data subject, you have the following legal rights in respect of your personal data, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you;
- The right to rectification if any personal data We hold about you is inaccurate or incomplete.
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us).
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.
- If you have any cause for complaint about Our use of your personal data, please contact Us and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with Ireland's supervisory authority, the Data Protection Commission or Information Commissioner's Office (ICO) in the UK.

Withdrawing your consent: If We are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from Our email marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that We send, or by contacting us using the details provided in the section below. You will then be removed from the marketing lists. However, We may still communicate with you – for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of Our Websites. For further information, please see the Cookie Policy.

To talk to us about personal data please contact Our data protection officer at dpo_ukir@systra.com. For further information about your rights, please contact the Information Commissioner's Office (ICO) or the Data Protection Commission in Ireland.

HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact the Data Protection Officer for more details at dpo_ukir@systra.com. For further information please refer to Data Security Policy and Data Protection Policy.

Data Protection Policy (GDPR) 2023 [DOWNLOAD](#)

CONTACTING US

If you have any questions about the Website or this Privacy Policy you may contact Our Data Protection Officer (DPO) by email at dpo_ukir@systra.com or by post at the below address.

SYSTRA Ltd
Data Protection Officer
3rd Floor
One Carey Lane
London EC2V 8AE

CHANGES TO OUR WEBSITE PRIVACY POLICY

We may change this Website Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on the Website and you will be deemed to have accepted the terms of the Website Privacy Policy on your first use of the Website following the alterations.



Nick Salt
CEO
SYSTRA LIMITED - UK & IRELAND
January 2025