PRIVACY STATEMENT E-LIA

9 November 2026

E-lia attaches great importance to the protection of personal data. We process personal data solely in accordance with the General Data Protection Regulation (GDPR).

This statement applies to two situations: visiting our website (www.e-lia.co.uk) and using the E-lia platform (the “Web Application”). E-lia B.V. is established at Tommaso Albinonistraat 7, 1083 HM Amsterdam, the Netherlands, and is registered with the Dutch Chamber of Commerce under number 84016833 (“E-lia”).

1. E-lia’s role

Our role under the GDPR differs depending on the situation:

- When you visit our **website**, E-lia itself determines why and how we process data. For those processing activities, E-lia is the **controller** (see part 2).
- When you use the **E-lia platform** as an end user, visitor or administrator, this takes place under the management of the organisation that uses E-lia (the “Customer”). That Customer decides which people are added and for what purpose, and is therefore the controller. E-lia processes those data solely **as a processor**, on behalf of and in accordance with the Customer’s instructions (see part 3).

2. Visiting our website

For the processing activities in this part, E-lia is the controller.

2.1 Contact, demo and download requests

When you complete a form on our website, for example to get in touch, request a demo or download a toolbox talk or form, we process your name, organisation, email address, telephone number and your message. We also record the page on which you completed the form, including any campaign data in the link (for example whether you arrived via an advertisement), and your IP address. If you book a demo via Calendly, your name, email address and the chosen time are processed.

We use these data to respond to your query, send the requested download, schedule a demo, follow up on your request and measure through which channels requests come in. We record requests in our customer relationship management system (CRM).

The legal basis for this is our legitimate interest in responding to your request and communicating with interested parties. We retain these data no longer than necessary, in principle for a maximum of twelve (12) months after the last contact, unless a customer relationship arises from it.

2.2 Cookies and statistics

Our website uses cookies and similar techniques, divided into three categories:

- **Necessary cookies**, among other things for your language preference and to record your cookie choice.
- **Statistics cookies**, with which we measure the use of the website via Google Analytics 4. In doing so, we process among other things your IP address, device and browser data and your browsing behaviour on the website.
- **Marketing cookies**, for measuring advertising results via Google Ads and Microsoft Advertising (Bing). If you submit a form, this may be measured as a conversion when you have accepted marketing cookies.

These tags are managed via Google Tag Manager and only fire on the website, not in the Web Application. Part of the measurements runs via E-lia's own measurement server, hosted on Google Cloud. Data are first sent to this server before they are passed on to Google or Microsoft, and only with your consent.

For all non-essential cookies we ask for your consent in advance via our cookie banner (CookieHub); that is the legal basis for those cookies. We place necessary cookies on the basis of our legitimate interest. The complete and always up-to-date list of cookies (name, purpose, retention period and provider) can be found in the cookie settings on the website, where you can also change or withdraw your consent at any time.

2.3 Hosting and security of the website

Our website runs on Cloudflare. In this context your IP address is processed in order to display and secure the website, including protection against attacks and spam via forms (Cloudflare Turnstile). The legal basis for this is our legitimate interest in a secure and properly functioning website.

2.4 Contact via WhatsApp

If you contact us via the WhatsApp button on the website, we process your telephone number, your name as shown in WhatsApp and your message in order to answer your question. The use of WhatsApp itself is also subject to WhatsApp's privacy policy.

3. Using the E-lia platform

For the processing activities in this part, the Customer is the controller and E-lia acts as the processor. E-lia and the Customer set out the arrangements for this in a data processing agreement.

3.1 Which personal data

- For **end users** we process first name, surname and an email address and/or mobile telephone number, the chosen language, together with data on participation, progress and use within the Web Application, such as the registration of a toolbox talk via a QR code. When communicating via WhatsApp, we additionally process the content of messages and delivery metadata (see 3.3).
- For **visitors and external parties** who complete a gate instruction, we process name, company, date, language, the version of the instruction and the test result.
- For **administrators** we process first name, surname, email address and telephone number.

These data are entered by the Customer's administrator, by the data subject themselves (for example for a gate instruction) or synchronised automatically via an integration with a system of the Customer.

3.2 Purpose and legal basis

We process these data solely to give end users and visitors access to modules, instructions and content, to record their participation and progress, to give administrators access to the dashboard, and to deliver and improve the service technically.

Because E-lia acts as a processor here, the Customer determines the legal basis for the processing (for example consent, legitimate interest or a legal obligation of the employer). E-lia processes solely in accordance with the Customer's instructions.

3.3 Use of WhatsApp

E-lia uses the WhatsApp Business Cloud API to communicate with end users. Messages are encrypted during transmission (encrypted in transit). Via the Cloud API, the content of messages is processed by Meta in order to deliver the message; this content is temporarily stored by Meta (for a maximum of 30 days) and then deleted. Via this API, E-lia processes the mobile telephone number, the content of the message and delivery metadata. WhatsApp Ireland Limited (Meta) is engaged as a sub-processor for this purpose.

If a user opts for communication via email instead of WhatsApp, only the email address is used and delivery takes place via our email sub-processor.

Although the communication is technically secured, it remains important for organisations to establish internal guidelines for handling confidential information.

4. Storage, security and sub-processors

All personal data processed via the platform are stored encrypted (AES-256) and stored solely within the EEA. Data transmission takes place via HTTPS with TLS encryption. Only authorised staff have access, the environment is monitored, and there is a back-up strategy with tested recovery procedures.

We never share personal data with third parties for commercial purposes. E-lia does engage sub-processors for the technical delivery of the service (including hosting, monitoring and the delivery of email and messages). These sub-processors are established within the EEA. The current list of sub-processors is included in the data processing agreement.

5. Automated decision-making

E-lia does not use automated decision-making that affects users without human intervention.

6. Retention periods

We retain contact, demo and download requests as described in 2.1. The retention periods for cookies are set out in the cookie settings on the website. We delete end users' personal

data no later than 30 days after termination of the use of E-lia, including back-ups. We delete administrators' data as soon as the account is deactivated, unless a statutory retention period applies. We retain invoicing and administrative data in accordance with the statutory tax retention obligation (generally 7 years).

7. Your rights

You have the right of access, rectification, erasure, restriction of processing, data portability, to object to certain processing, and to withdraw consent previously given.

If your request concerns data you have left via our **website**, please contact us directly (see part 10). If it concerns data within the **platform**, please address your request in the first instance to the organisation that gave you access to E-lia; that organisation is the controller. E-lia will forward requests it receives directly without delay and will provide its full cooperation. When making a request, always provide sufficient information so that your identity can be verified.

8. Complaints

If you have a complaint about the way your personal data is handled, please first contact the responsible organisation or us. If you are unable to resolve it together, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, www.autoriteitpersoonsgegevens.nl). If you are in the United Kingdom, you can also contact the Information Commissioner's Office (www.ico.org.uk).

9. Changes to this privacy statement

We reserve the right to amend this privacy statement. The most recent version is always available on our website. If a change materially affects your data, we will inform you, for example by email or via the Web Application.

10. Contact

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