

# Ability Engineering Ltd Privacy Policy – March 2021

Ability Engineering Ltd is a UK registered company that provides software products (eaDocX® and Model Expert™), cloud computing (Sparx in the Cloud) and consulting and training services to IT users. This policy covers all personal information held by Ability Engineering Ltd. and its subsidiary companies.

Our mission is to help you model, design and document your business using industry best practices. To help us do that effectively, we collect personal information, but only use that information where we have a proper legal basis for doing so.

We wrote this policy to help you understand what information we collect, how we use it and what choices you have about it. We've tried our best to explain things in a simple and clear way. We welcome your questions and comments on this policy.

## **We collect information in a few different ways:**

### **1. When you give it to us or give us permission to obtain it**

- When you register on the eaDocX website, you give us certain information voluntarily. This includes your name, email address, username, role, and how you found us.
- We have a record of your postings on the eaDocX forum, submitted support tickets and correspondence via our website 'Contact Us' forms and online chat mechanisms on [www.eadocx.com](http://www.eadocx.com), [www.eamodelexpert.com](http://www.eamodelexpert.com) and [www.sparxinthecloud.com](http://www.sparxinthecloud.com)
- If you buy something, we collect payment information, contact information (address and phone number) and details of what you bought.
- When you participate in training or a workshop delivered by Ability Engineering you give us certain information voluntarily. This includes your name and email address.
- When we meet you at an industry event or user group meeting you give us certain information voluntarily. This includes your name and email address and may also include your role, company name and address.
- When you contact us on the eaDocX, Model Expert or Sparx in the Cloud websites, using the Contact forms or chat widgets.

## **2. We get technical information when you use our websites**

Cookie data. When we use cookies or other similar technologies, we use session cookies (that last until you close your browser) or persistent cookies (that last until you or your browser delete them). Some of the cookies we use are associated with your eaDocX account (including information about you, such as the email address you gave us) and other cookies are not. For more detailed information about how we use cookies, please review our Cookies Policy in the website terms of use.

## **3. We get technical information when you use our software**

Device information. Whenever you use our software (eaDocX or Model Expert) on a computer that is connected to the internet we collect unique device identifiers plus the software licence keycode and software version installed.

### **What we do with the info we collect:**

We use the information we collect to provide product support to you. In order to do that, it's necessary for us to use your information to:

- Identify you when you use [www.eaDocX.com](http://www.eaDocX.com) and process your transactions.
- Respond to your questions or comments.
- Prevent fraudulent use of the software.
- In addition, we have a legitimate interest in using your information to inform you about new features and services that are relevant, interesting and personal to you.

We also have a legitimate interest to improve eaDocX and Model Expert, maintain our relationship with you, and protect users. We both benefit when we use your information to:

- Conduct analytics on who is using [www.eaDocX.com](http://www.eaDocX.com) and what they are doing. For example, by logging how often people visit pages on our website we can make it easier for you to find and use the content that is relevant to you.
- Improve eaDocX and Model Expert and offer new features.

We also work with law enforcement. We may get requests for account information from law enforcement authorities like the police or courts.

### **Transferring your information:**

Ability Engineering Ltd provides software and services worldwide. As an Ability Engineering customer, or user of the websites [www.eaDocX.com](http://www.eaDocX.com), [www.eamodelexpert.com](http://www.eamodelexpert.com), or [www.sparxinthecloud.com](http://www.sparxinthecloud.com), you authorize us to transfer and store your information outside your home country, including in the United Kingdom, for the purposes described in this policy. The privacy protections and the rights of authorities to access your information in the UK may not be the same as in your home country.

We take additional measures when information is transferred from the European Economic Area (EEA). This includes having standard clauses approved by the European Commission in our contracts with parties that receive information outside the EEA. We also rely on European Commission adequacy decisions about certain countries, as applicable, for data transfers to countries outside the EEA.

### **Choices you have about your info:**

Edit information in your eaDocX profile at any time.

### **How and when we share information:**

We use My Commerce Share IT, a 3<sup>rd</sup> party organisation which is a subsidiary of Digital River, to manage our online shopping transactions.

When you buy something on [www.eaDocX.com](http://www.eaDocX.com), you are transferred to the My Commerce website. We share with them information necessary for you to make your purchase, including:

- your name and email address.
- the product(s) being bought.
- for product support extensions and renewals, the order number of the previous purchase to which this extension/renewal applies.

We share this information because it's necessary to make the purchase. As you are buying from the My Commerce website directly, their privacy policies and marketing policies apply to the information we share with them.

Our wholly owned subsidiaries and affiliates.

If we were to engage in a merger, acquisition, bankruptcy, dissolution, reorganisation, or similar transaction or proceeding that involves the transfer of the information described in this Policy, we would share your information with a party involved in such a process (for example, a potential purchaser).

We do not share personal information with any other companies or organisations.

### **How long we keep your information:**

We keep your information only so long as we need it to provide eaDocX, Model Expert or Sparx in the Cloud services to you and fulfil the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we can't identify you.

### **Our policy on children's information:**

Ability Engineering services and software products are provided to business entities and users only. No children's information is collected or held.

### **Your options:**

You have options in relation to the information that we have about you described below. To exercise these options, please contact us.

We have appointed IT Governance Europe Limited to act as our EU Representative. If you wish to exercise your rights under the EU General Data Protection Regulation (GDPR), or have any queries in relation to your rights or privacy matters generally please email our Representative at [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu) or post your request or query to:

EU Representative,  
IT Governance Europe,  
Third Floor,  
The Boyne Tower,  
Bull Ring,

Lagavooren,  
Drogheda,  
Co. Louth,  
A92 F682

When contacting our Representative please ensure you include our company name in any correspondence.

If you're a UK or EEA user, you can:

- Access the information we hold about you. We'll usually share this with you within 30 days of you asking us for it.
- Have your information corrected or deleted. You can update your information in your settings. If you have problems updating the information or if you would like us to delete it, contact us.
- Object to us processing your information. You can ask us to stop using your information, including when we use your information to send you marketing emails or push notifications. If you opt out of receiving marketing messages from us, we may still send you newsletters and updates about your account. We only send you marketing material if you've agreed to it, but if you'd rather we don't, you can easily unsubscribe at any time.
- Have the information you provided to us sent to another organization, where we hold this information with your consent or for the performance of a contract with you, where it's technically feasible.
- Complain to a regulator. If you're based in the EEA and think that we haven't complied with data protection laws, you have a right to lodge a complaint with the Data Protection Commission in Ireland or with your local supervisory authority.

**How we make changes to this policy:**

The best way to get in touch is using the Contact Forms on [www.eadocx.com](http://www.eadocx.com) or [www.sparxinthecloud.com](http://www.sparxinthecloud.com). You can contact the Ability Engineering Ltd. Data Protection Officer at The New Inn Business Centre, 527 Moseley Road, Balsall Heath, Birmingham, B12 9BU.

Effective March 1, 2021