

## Privacy Policy

The Privacy Policy statement applies to information which is collected from visits to the Exa Networks website (<https://exa.net.uk>), it does not apply to any sites we link to. We have a legal duty to protect any personal information we collect and take appropriate measures to do so.

## Exa Networks' Policy Information

All documents on the Document Management System are live and present. Documents received in PDF format are uncontrolled and at the time of download.

### Version Control

Title	Version	Reviewed By	Approved	Confidentiality
Privacy Policy	1.0	Emily Ruthven 09/08/2021	Michael Syree	Public

### Change History

▼ [Click here to expand...](#)

Version	Date	Author	Description of Change
1.0	26/05/2020	Panoptic Consultancy	First Issue

## Scope and Responsibilities

### Scope

Exa Networks' policies and procedures apply to all staff and third parties, including, but not limited to; contractors, agency workers, permanent employees, associates and students operating on behalf of Exa Networks or accessing the company services at;

Exa Networks Limited 100 Bolton Road Bradford BD1 4DE

### Responsibilities

- The Directors of Exa Networks retain overarching responsibility for the confidentiality, integrity and availability of corporate data
- The Directors ensure the continued suitability, effectiveness and relativity of all Exa Networks' policies and procedures, through periodic review. The compilation, amendment and distribution of associated documentation requires Director approval
- Department Managers are responsible for ensuring that staff remain compliant with Exa Networks' policies and procedures, through completing appropriate, formal and informal, assessments. Department Managers are to ensure that all staff have received adequate training in order to meet the outlined requirements, including both new-starters and existing employees
- Should any instances of non-conformance occur, Department Managers are responsible for ensuring that the Information Governance Department are notified. Department Managers are responsible for the facilitation of internal and external audits within their domain, allowing for necessary accommodations to be made and ensuring that any identified corrective action is applied/adopted
- Individual staff members are responsible for ensuring that all activity and individual work remains in accordance with the requirements of internal policies and procedures. Inclusive of those retained on the document management system and within the staff handbook and health and safety handbook. Should further information be required to assist with the understanding of company policy and procedures, the staff member is required to notify their line manager (in the first instance). Alternatively, the staff member shall contact the Information Governance department
- The Information Governance Department is responsible for the maintenance, generation and communication of Exa Networks' policies and procedures, including the; compilation, update and distribution of all associated documentation (as required), as well as the facilitation of staff training and verification of organisational compliance, through the completion of scheduled internal audits.

### Non-conformance

All policies require the full participation of staff and contractors to be successful. Failure to comply with the requirements outlined within Exa Networks' policies and procedures constitutes misconduct and may result in disciplinary action, up to and including dismissal.

## Privacy Policy

### Purpose, Scope and Users

This privacy statement applies to information we may collect when you visit the Exa Networks website - <https://exa.net.uk> It does not apply to any sites we link to. We have a legal duty to protect any personal information we collect and take appropriate measures to do so.

All information is handled lawfully in accordance with the Data Protection Act 2018 (as amended from time to time). When you visit our website, some details are recorded from your web browser for statistical purposes only. This information helps us in finding out which pages are of most interest and how many visitors our website serves.

### Cookies

Cookies are used where you have identified yourself to the site on the login pages so that the site can provide you with additional functionality for the duration of your visit to the website.

A cookie is a small text file written to your hard drive that contains information about you. Cookies do not contain any personal information about users.

Once you close your browser, the cookie simply terminates. We use cookies to process and identify data so that we can personalise your experience of our website. You can set your browser to refuse cookies and you will still be able to use our website.

In compliance with EU legislation, the following table lists the use of cookies on this web site:

Cookies our websites use

Across our websites, we use a range of cookie types, generally split into the following areas:

**Essential Cookies:** Required for the operation of our websites and tools, these cookies allow users to log into secure areas of our site, use online forms and more.

**Analytical Cookies:** Used to determine how visitors are accessing and using our website, from determining a visitor count to seeing the most popular pages. We use this data to improve the service that our websites offer.

Not all of these cookie types are used on all of our websites - we primarily use analytical cookies, building up an understanding of how our customers interact with our websites to provide you with a better level of service.

All of our websites use cookies, from this main site to our education/ business pages, our DarkLight and exa.foundation websites, and all other pages created by Exa Networks. By using any of our sites and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

The website is owned and operated by Exa Networks Limited.

### Your Personal Information

Any personal information is held safely with our security systems preventing unauthorised access. When you complete a form that requests personal information or email us, you will provide information with which we can identify you. This information will be treated in confidence and only used for the purposes for which it was provided. Exa Networks will not sell or rent your personally identifiable information to anyone. If we change our Privacy Policy, we will post any changes on this website so that you are always aware of how we use your information.

All telephone calls may be recorded for the purposes of training and monitoring and to comply with the Data Protection Acts requirement to provide 'Fair Processing' information.

Exa Networks are committed to protecting the privacy of our users, clients and customers. This privacy statement explains how we use any personal information we collect about you when you use this website. It is also intended to assist you in making informed decisions when using our website and our products and services.

All your personal Information shall be held and used in accordance with the General Data Protection Regulation. If you want to know what information we collect and hold about you, please email us at [DPO@exa.net.uk](mailto:DPO@exa.net.uk) or by writing to the Data Protection Officer, Exa Networks, 100 Bolton Road, Bradford, BD1 4DE

## How Do We Use Your Information?

The information which you provide to Exa Networks will be used within the company for the administration of any of Exa Networks' related products and services of which you avail. Data may also be used for statistical analyses and Exa Networks may share information with law enforcement bodies/ fraud prevention agencies for the purpose of preventing or detecting fraud. We may share your data with trusted third parties who process data on our behalf.

## Your Rights

Under GDPR, individuals now have increased rights in regard to their personal data. Please see below an outline of your rights and if you wish to contact us to discuss or amend the data we hold, please contact us [DPO@exa.net.uk](mailto:DPO@exa.net.uk)

- Right to be Informed
- Right of Access
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability
- Right to Object
- The Right not to be Subject to Automated Decision-Making Including Profiling

## Data Breach

If Exa Networks were to experience a data breach they would:

- Within 72hrs upon realising a breach had occurred and where feasible, report certain types of personal data breach to the relevant supervisory authorities.
- If the breach is likely to result in a high risk of adversely affecting our customer's individual rights and freedoms, we will also inform those individuals without undue delay.

## Validity and Document Management

The owner of this document is the Information Governance Team who must check and, if necessary, update the document at least once a year.