

## Aéto Privacy Policy

### I. Introduction

Aéto Group Ltd ('the Company') is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website, use our services, or interact with us in any other way.

This Policy applies to everyone who visits the Company's website, receives communication from the Company, uses the Company's services, or takes part in any activity led by the Company.

Please read this Privacy Policy carefully to familiarise yourself with our views and practices regarding your personal data. This policy is designed to help you understand what information we collect and how we share and use that information.

By using our website and services, you agree to the collection and use of information in accordance with this Privacy Policy.

This Policy is reviewed at least once a year. If we make significant changes to this document, we will notify you by email. If you have any questions about this Policy, you can email [connect@aetostrategy.com](mailto:connect@aetostrategy.com)

### II. Information we collect

We may collect and process the following types of information:

- **Personal Information:** Information that identifies you personally, such as your name, email address, phone number, postal address, and any other information that you provide to us voluntarily through forms on our website or in communications with us.
- **Usage Data:** Information about how you use our website, including your IP address, browser type, pages viewed, and the date and time of your visits.
- **Cookies and Tracking Technologies:** We use cookies, and other similar technologies to collect information about your browsing activities over time. This helps us to improve our website and provide you with a more personalized experience. You can manage your cookie preferences through your browser settings.
- **Third Party Platform Information.** We may collect information when you interact with our advertisements and other content on third-party sites or platforms, such as social networking sites. This may include information such as "Likes",

profile information gathered from social networking sites or the fact that you viewed or interacted with our content.

- Employment details: including previous employer, length of service and right to work.

It should be noted that the process of information related to the Company's website is based on Legitimate Interest.

### III. How we use your information

We use the information we collect in the following ways:

- To provide, operate, improve and maintain our website and services.
- To communicate with you, including responding to your inquiries, providing customer support, and sending you updates or promotional materials.
- To comply with legal obligations and protect our legal rights.
- Specifically for employees and contractors, to process payroll, manage employment records and lead internal projects.

### IV. Sharing your information

We do not sell, trade, or otherwise transfer your personal information to third parties, except in the following circumstances:

- Service Providers: We may share your information with third-party service providers who perform services on our behalf, such as payment processing, data analysis, or email delivery.
- Legal Requirements: We may disclose your information if required by law, such as to comply with a subpoena, court order, or other legal processes.

### V. Your rights and choices

**The right to access:** You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with.

**The right to rectification:** You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.

**The right to erasure:** You have the right to ask us to delete your personal information.

**The right to restrict of processing:** You can object to the processing of your personal data under certain conditions.

**The right to object to processing:** You have the right to object to the processing of your personal data.

**The right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

**The right to withdraw consent:** When we use consent as our lawful basis you have the right to withdraw your consent at any time.

## VI. Data retention and disposal

The Company follows [Information Commissioner Office \(ICO\)'s guidance](#) when it comes to data retention and disposal. As a general principle, the period for which the Company retains data depends on business needs, regulatory standards or legal requirements.

## VII. Contact us

If you have a question or want to discuss the content of this policy, you can contact us in one of the following ways:

**Email:** [connect@aetostrategy.com](mailto:connect@aetostrategy.com)

**Phone:** +44 (0) 208 044 9892

**Registered office:**

Aéto Group Ltd

c/o Bracher Rawlins

16 High Holborn

WC1V 6BX London

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details listed in this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO, as the UK's independent authority overseeing data protection compliance.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

<b>Version</b>	<b>Owner</b>	<b>Date</b>	<b>Revision information</b>
1.1	Chloé Masson	21 <sup>st</sup> November 2024	First version of the policy