



Privacy Policy

Last updated 16th July 2025

Elisian Limited is a Provider of software solutions to both the Oil and Gas Sector and Public Sector communities. This includes eLogbook solution which is used to improve reliability and manage safety in the Process Sector, Medevac in the process sector for medical evacuations and e3c solution which case manages an individual through interventions and monitoring.

This privacy notice for Elisian Limited ('we', 'us', or 'our'), describes as a data controller how and why we might collect, store, use, and/or share ('process') your information when you use our services('Services'), such as when you:

- Visit our website at <http://www.elisian.co.uk>, or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events.
- Your information is stored within one of our products (e3c and elogbook) used by our customers.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services.

If you still have any questions or concerns, please contact us at rci-dpo@rcigroup.co.uk

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We process sensitive personal information only at our customers' requests to resolve errors for Elisian products in customer hosted systems.

Do we receive any information from third parties? We do not receive any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, 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 information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights?

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us.

In Short: *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us being your name and email address. This is mostly solely for the processing of clients' contact details for marketing purposes.

Special Category Data. We only handle special category data when requested by our customers, and solely to fix errors in Elisian products used in customer-hosted systems. This typically involves correcting inaccurate data that the customer cannot update themselves, as the data is owned by the customer—not by Elisian.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected.

In Short: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. 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 Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. For more information on how we use cookies, and other technologies please see Section 8 of this Privacy Notice.

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 Services 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 settings and information about your activity in the Services (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).

- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Some of this device data may be considered personal data under applicable data protection laws. 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.

- **Location Data.** We collect location data such as information about your device's location, which can be either precise (GPS-Level accuracy) or imprecise (IP Address). How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). 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.

Location data is considered personal data under applicable laws and is handled in accordance with our privacy practices and safeguards

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: *We process your information to provide, improve, and administer our Services, 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 Services, including:

- To contact you with your name and email address you have provided to as part of sales and marketing engagements.

- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

- **To fulfil contractual obligations and maintain service quality:** When acting as a data processor on behalf of our customers (the data controllers), Elisian may be required to access customer data for the purpose of resolving technical issues or correcting data errors. This access is limited to what is strictly necessary to fulfil the customer's instructions and ensure the continued security and functionality of the Services.

- **Processing of special category data:** In certain cases, the data accessed within e3c through a customer request and may include special categories of personal data as defined under Article 9 of UK GDPR. These may include information relating to:
 - Race or ethnic origin
 - Religious or philosophical beliefs
 - Health or mental health conditions
 - Sexual orientation
 - Medication prescribed
 - Risk to self or others
 - Employee details (e.g., name, address, date of birth, injury or illness, next of kin)

In such instances, processing is carried out strictly under the direction of the data controller and in accordance with applicable legal safeguards and data protection agreements.

No data will be retained by Elisian beyond what is strictly necessary to fulfil the identified purpose. All access is logged, secured, and conducted in line with our obligations under data protection law.

3. 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. As such, we may rely on the following legal bases to process your personal information:

- **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.
- **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.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your life or the life of a third-party and consent cannot be gained.
- **Contractual customer data.** We may process your information due to a contractual relationship with our customers who require us to fix or resolve an error within our products e3c and Medevac. Data that may be accessed may be special categories of personal data within e3c being race, ethnic origin, religion or philosophical belief, health (including mental health), sexual orientation, Medication prescribed, Risk to others or self. Within Medevac Employee information – including Name, Address, Telephone, DOB, Injury or illness detail, Next of Kin.

No data will be retained by Elisian if required to access this information to resolve any errors that require fixing. All requirements for any processing of information as requested by our customers falls within a Data Processing Agreement.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: *We may share information in specific situations described in this section and/or with the following third parties.*

We may 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. Relevant safety protocols would be in place should this scenario occur and where appropriate Non-Disclosure Agreements set up to ensure any new buyer keeps personal information confidential.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your information for as long as necessary in line with our retention policy based on applicable laws and legislation to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process.

Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk.

You should only access the Services within a secure environment.

Hosted Customer data is housed within an ISO 27001 certified secure cloud-based servers.

7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: *We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

If you become aware of any data, we may have collected from children under age 18, please contact us at dpo@rcigroup.co.uk.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Switzerland, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right:

- (i) to request access and obtain a copy of your personal information,
- (ii) to request rectification or erasure;
- (iii) to restrict the processing of your personal information;
- (iv) if applicable, to data portability; and
- (v) not to be subject to automated decision-making.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us dpo@rcigroup.co.uk.

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.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

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 dpo@rcigroup.co.uk.

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.

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. You can decide how you use cookies on this website by clicking the cookies button under useful links.

If you have questions or comments about your privacy rights, you may email us at

dpo@rcigroup.co.uk

You also have the right to complain to the ICO if you are unhappy with how we use or have used your data.

Elisian: 12458415

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://ico.org.uk>

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a DoNot-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE

COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us. If the data is owned by our customers, you will need to contact them directly.

1. The right to be informed

The right to be informed encompasses the obligation to provide clear and concise 'fair processing information', which we do through our privacy notice. It emphasises the need for transparency over how we use personal data. We therefore publish our Privacy Notice on our public webpage and aim to make it easily accessible.

2. The right of access

You have the right to access and request a copy of the information we hold about you, both on paper and electronically unless the information or part thereof is considered to have the potential to cause mental or physical harm to the individual or someone else.

3. The right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Individuals can use their right to rectification to request sections of their records are amended or removed. Additionally, this right can be exercised if the individual believes information has been omitted and requires inclusion on their record. This is not an absolute right and pertinently, it must be recognised that clinical opinion is subjective and thus we reserve the right to refute any request deemed inappropriate.

4. The right to erasure

You have the right to request that organisations erase personal data about you that they hold. This is not an absolute right however, and depending on the legal basis that applies, an organisation may have overriding legitimate grounds to continue to process the data such as if you are a patient and your request is in relation to your health record. We cannot delete health records or information within a record unless they require rectifying.

5. The right to restrict processing

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data. We will restrict processing of your personal data whilst we consider its accuracy or the legitimate grounds for processing the personal data in question.

6. The right to data portability

You have the right to obtain and reuse their personal data for their own purposes across different services. It allows them to move copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

7. The right to object

You have the right to object to:

processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

direct marketing (including profiling); and

processing for purposes of scientific/historical research and statistics.

8. Rights in relation to automated decision making and profiling.

The UK GDPR applies to all automated individual decision-making and profiling. Article 22 of the UK GDPR has additional rules to protect individuals if an organisation is carrying out solely automated decision-making that has legal or similarly significant effects on them. The processing is defined as follows:

Automated individual decision-making (deciding solely by automated means without any human involvement). Examples include an online decision to award a loan; or a recruitment aptitude test that uses pre-programmed algorithms and criteria. Automated individual decision-making does not have to involve profiling, although it often will do.

Profiling (automated processing of personal data to evaluate certain things about an individual) and includes any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

There are exemptions to some of your rights. To find out more please visit the ICO website

(<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/what-other-exemptions-are-there/>) .