



# AtlasEdge

# Privacy Statement



## Privacy Statement

AtlasEdge is a brand name for AE Group S.à r.l. and all its subsidiary undertakings and member entities (collectively, "AtlasEdge", "AtlasEdge Group", "we" or "us"). Any reference to AtlasEdge includes all companies under AE Group S.à r.l (AtlasEdge Group). References to "we" or "us" throughout this Privacy Statement are references to AtlasEdge.

This Privacy Statement describes how we collect, use, share and otherwise process your Personal Data, and how you can learn about your rights and choices regarding our processing of your Personal Data.

We collect and use your personal data to help us administer our relationship with you. We do this taking into account applicable local legal and regulatory legislation, like the GDPR, UK GDPR and ePrivacy.

## When do we collect Personal Data?

For the purposes of this Privacy Statement, "Personal Data" means any information that identifies you, that could be used to identify you or that relates to you, and that you submit about you when interacting with us and/or is otherwise collected by us when you visit our website, by phone, e-mail, writing or in another manner. During our relationship with you we may collect and process your Personal Data, such as your name, address, phone, email and other contact details, and any other data relating to you which you may provide. This may include when you are:

- Accessing our data centre or office locations
- A participant in our conferences, events, and learning sessions
- Visiting our website
- Completing the 'Get in touch' form on our website
- Participating in a promotion, event, survey or other marketing campaign we organise
- Signing up for our newsletters and other promotional materials
- Enquiring about our services or contacting us
- Entering into or negotiating a contract with us and when you purchase our services
- Working with us as an employee, supplier of services or a contractor
- An applicant in our recruitment process

## What type of Personal Data do you provide us?

The types of Personal Data you may provide us are outlined below.

### Identity data:

- Your identity data and contact details (such as name, address, function/title, phone, mobile numbers, identity (E.G. passport), email address)
- Identity data and contact details of third parties you provide to us (such as name, address, function/title, telephone, mobile numbers, passport, email address)
- Identity and message data, e.g. through the 'Get in touch' form on our website, the data included in the request (e.g. your name, e-mail address and message)
- Identity data when registering for an AtlasEdge event: we will store your contact details when you fill in the registration form in order to attend any of our events
- Electronic and hard copy correspondence
- Self images and voice recordings E.G. captures via remote calls and correspondence, Security systems including CCTV

### Financial data:

- Financial and payment data such as banking details, invoices and payment terms as well as any Personal Data for fulfilling and legitimate processing of billing information
- Tax identification number where you request services that require such information be provided

### Content data:

- Survey responses provided to us
- Complaints and enquiries to us

## Personal Data collected by automated means

When you visit our website or use our services, subject to your prior consent where required by law, we may process Personal Data without you actively submitting such information, via automated means, using technologies such as cookies, web server logs, web beacons, and similar technologies on our website or for example via CCTV recordings in our locations. AtlasEdge may collect data in the following ways through information automatically gathered:

**On our website:** To the extent permitted under applicable law and, where required, subject to your explicit consent, AtlasEdge uses cookies and other technologies to collect amongst others navigational information about where visitors go on this website, how many visits are made to this website, when this website is visited, and other data. To learn more about our use of cookies and type of cookies collected please read the <Cookie Statement>.

**In our locations:** Security at AtlasEdge data centres includes security measures such as restricted access and the use of CCTV in line with applicable data protection laws. We may process CCTV footage of customer personnel for the purposes of ensuring safety and the

security in the data centre. On a case-by-case basis we may share video footage with our customer or law enforcement to ensure safety and security or because of a legal obligation to do so. Notices are provided at all locations where CCTV is deployed.

## **Use of collected Personal Data**

AtlasEdge as the Data Controller shall only process your Personal Data for the purposes described in this Privacy Statement or as otherwise permitted under applicable law. The processing of your Personal Data by AtlasEdge for the purposes described hereunder is based on:

- Performance of a contract;
- Your explicit consent;
- Compliance with a legal obligation;
- Our legitimate interests, provided that they are not overridden by your interests

as provided by Article 6.1 of the General Data Protection Regulation (EU) (“GDPR”) and of the UK GDPR. Where we rely on your consent to process your Personal Data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interest, you have the right to object.

We may process your Personal Data for the following purposes:

- to provide services, including access to applicable space within a data centre;
- to administer our relationship with you, including to respond to your inquiries or complaints;
- to provide any services or information you have requested and information about our services;
- to administer, operate, maintain, and improve our website and our services;
- for efficient customer management relationship;
- to manage your accounts, orders, invoices and payments;
- to administer accounting and taxes;
- to manage and provide after-sale services;
- to provide operational maintenance and support;
- to provide a secure service;
- to perform fraud detection and prevention;
- to recruit new personnel;
- to respond to requests from administrative or judicial authorities; and
- to comply with applicable laws and regulations.

Providing Personal Data for these purposes is necessary and refusal would make it impossible for AtlasEdge to manage its contract or other business relationship with you or to comply with its

contractual and legal obligations. Subject to your consent where required by law or legitimate interest, we may also use your Personal Data in order:

- to evaluate the effectiveness of our website and analyse trends;
- to improve the services that we offer;
- to provide communications to keep customers informed of our services;
- to conduct promotional campaigns, surveys and other marketing initiatives;
- carry out business analytics or market research.

Providing Personal Data for marketing purposes is optional and refusal will have no consequence on the performance of any contract by AtlasEdge. As a business contact, we will be holding, processing your data and contacting you under the legitimate interest, or where required consent, provision of the (UK) GDPR and in line with ePrivacy local legislation (for instance in the UK, the Privacy and Electronic Communications Regulations (PECR)), having undertaken an appropriate balancing assessment. However, if you no longer wish to hear from us, you can always easily opt-out in the following ways:

- Unsubscribe from specific communications, for example via email or SMS unsubscribe links
- Inform your business contact within AtlasEdge who will pass your wishes on
- Contact us using [Privacy@atlasedge.com](mailto:Privacy@atlasedge.com)

When you request to be removed from certain marketing offers, you will, in accordance with applicable data protection laws, be added to the relevant internal suppression list(s) to ensure your request is complied with.

The data you provide when you are interested in working for AtlasEdge will be processed by AtlasEdge as the Data Controller for the purpose of candidate selection, placement and employment. During the recruitment process, vetting will take place, where data will be shared with a third party to support this vetting process. Depending on the job role you are interested in, vetting will include an ID check, right to work check, last employment check and in some cases a criminal record check depending on local legislation and requirements.

We take every reasonable step to ensure that your Personal Data that we process is accurate, and, where necessary, kept up to date.

## How long do we keep your Personal Data for?

We only retain information for as long as is necessary and in accordance with any legal requirements that we are required to meet.

For instance:

CCTV footage in our sites is kept according to local regulation and Data Protection Authority guidance. This depends per country or region. Most countries apply a maximum retention of 30 days.

In the recruitment process, if you are not joining our team, then your data will be retained for a maximum period of up to one (1) year after closing the selection process.

## **Do we share your Personal Data?**

Our policy is to not give, sell or otherwise distribute Personal Data we collect to third parties outside of AtlasEdge, except where required with your explicit consent or where this is necessary and in accordance with applicable law. In line with this, we share Personal Data with the recipients listed below.

**AtlasEdge Group members.** We may share your Personal Data with members of the AtlasEdge Group. For the purposes specified under the "Use of Collected Personal Data" section previous and as described under the "International Data Transfers" section in this document. Members of the AtlasEdge Group may use Personal Data collected through the web form on the website, for example, to respond to those individuals who request company information regarding the member or who submit other requests or questions regarding the member.

**Third party service providers.** Your Personal Data may be disclosed to third party service providers, acting on our behalf, in connection with managing services, data analytics, marketing and service messaging, finance, accounting or other administrative services and information technology support. These third party service providers will have access to and process Personal Data only on our behalf and under our instructions and will be held to appropriate security obligations.

E.G. if you are interested to join AtlasEdge and you have provided your data on the 'Get in Touch' form on our website, your data can be shared with other members of the AtlasEdge Group and third party organizations providing recruitment, vetting, selection, placement and employment services. Such third parties will use candidate information only in connection with such services, and applicable law.

**Other Customers.** We may share your Personal Data with other customers based on your prior consent (E.G. for cross-connection purposes within our data centre facilities).

**Other data recipients.** For the above purposes or where otherwise required by law, we may also need to make Personal Data available to third parties such as advisors, banks and financial institutions, potential or existing investors, regulatory and/or administrative authorities, courts, police authorities.

You should also be aware that we may disclose specific information about you if necessary to do so by law, or it is necessary to protect the users of our website, of our services or the public. AtlasEdge may provide information, in response to properly made requests, for the purposes of

the prevention and detection of crime, and the apprehension or prosecution of offenders, when required to do so by law.

We may also disclose Personal Data about you when you explicitly consent to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by your interests or fundamental rights and freedoms.

## **Third party management**

AtlasEdge ensures third party privacy compliance through a third party risk assessment process to ensure appropriate privacy checks are done. Once the privacy due diligence is positively completed, prior to sharing any Personal Data with third parties, a data processing agreement containing requirements stipulated in Article 28 of the GDPR is executed between the parties. If it concerns a transfer of Personal Data outside the EEA, the “International Data Transfers” section below provides more information on how we deal with this. Furthermore, AtlasEdge may carry out audits to check third party privacy compliance.

## **What happens when you provide us with Personal Data about third parties?**

If you provide us with Personal Data about third parties, you warrant, represent, and undertake that you have complied with applicable data protection laws including informing and obtaining all necessary consents and approvals for the provision of such Personal Data to AtlasEdge and the processing by AtlasEdge of this Personal Data as described in this Privacy Statement.

## **International Data Transfers**

In the performance of our contract with you or in providing our services or website to you, we may need to transfer your Personal Data to third parties that are located outside the European Economic Area (“EEA”) where different privacy rules apply. In any case, as per Article 46 of the GDPR, we will only transfer Personal Data to recipients that provide an adequate level of data protection or as permitted by applicable data protection laws by implementing appropriate safeguards, including, but not limited to, relevant data transfer agreements like the European Commission-approved Standard Contractual Clauses. These clauses are contractual commitments between companies transferring Personal Data, binding them to protect the privacy and security of the data and to assure that Personal Data is processed with the same level of protection that in the European Union.

When using our website, AtlasEdge applies a Content Distribution and Attack Protection System. Due to the nature of the internet and these security systems your connection might be routed through any server worldwide. However, information you provide (for example in the ‘Get in Touch’ Form) will only be stored and processed in Europe, and, when necessary to respond to your request, shared with AtlasEdge Group member locations. Member locations are based in the EU, UK and Switzerland. UK and Switzerland have an EU Adequacy decision, which means

that data is allowed to flow between the EU, UK and Switzerland. In addition, AtlasEdge has implemented an intragroup data processing agreement, to ensure compliance with GDPR.

## Security procedures

We establish and maintain adequate security procedures to protect the security and integrity of your Personal Data. AtlasEdge will ensure that appropriate policies and technical and organisational measures are in place, reflecting the current security landscape, to safeguard and protect your Personal Data against unlawful or unauthorised access, accidental loss or destruction, damage, unlawful or unauthorised use and disclosure. We will also take reasonable precautions to ensure that our employees who have access to Personal Data about you have received adequate training.

## Your rights

In accordance with applicable data protection law, you have the following rights:

- Right to Access your data: Obtain confirmation of the existence of, and to request a written copy of the Personal Data AtlasEdge holds about you;
- Right to Rectification: Have any inaccurate information about you corrected;
- Right to Information: Receive information on how AtlasEdge processes your data
- Right to Erasure: Have Personal Data we hold about you deleted, blocked or removed;
- Right to Object: Object to the use of your details for marketing activities and other promotional activities;
- Rights related to Automated Decision-making and Profiling: Right not to be subjected to automated decision-making or profiling that produces legal effects or significantly affects you;
- Right to Restrict: Restrict the processing we make in relation with your Personal Data;
- Right to Data Portability: Receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format in order to transmit them to another data controller; and
- Right to Lodge a Complaint: Lodge a complaint with a Supervisory Authority, if you consider that the processing of your Personal Data by AtlasEdge infringes applicable data protection law.

In case you wish to exercise any such rights, please send a request to [Privacy@atlasedge.com](mailto:Privacy@atlasedge.com). Or when you want to lodge a complaint with a Supervisory Authority, please do so at the relevant EU Member State Supervisory Authority in the Member State of your habitual residence, place of work or place of the alleged infringement.

## Links

Our website may contain links to other websites, which may be operated by members of the AtlasEdge Group or third parties, like Hubspot or LinkedIn. The website to which AtlasEdge



provides links may use cookies, and may collect information about your browsing and internet navigational history. The linked website may also allow opportunities for you to voluntarily provide Personal Data. Therefore, before you provide any Personal Data, we recommend that you review the Privacy Statement associated with the website where you will be submitting your information.

## Contact

If you have any questions or queries about how we process your Personal Data, or if you wish to exercise your Rights (e.g. to access, delete or to object to the processing of your Personal Data) you can contact us sending an email to [Privacy@atlasedge.com](mailto:Privacy@atlasedge.com).

## Changes to this Statement

If elements of our privacy practices change, we will inform you by updating the Privacy Statement on our website.

This statement was last updated: 17 May 2024