

# Privacy Policy for Avallen Solutions Sustainability Tool

Last Updated: 01/09/2025

## 1. Introduction

Welcome to the Avallen Solutions Sustainability Tool ("the Tool"), provided by Avallen Solutions Ltd ("we", "us", "our"). We are committed to protecting and respecting your privacy.

This policy explains what personal data we collect from you, or that you provide to us, how it will be processed, and your rights in relation to that data. This policy applies to the data processed within our software-as-a-service platform.

For the purpose of the UK General Data Protection Regulation (UK GDPR), the data controller is Avallen Solutions Ltd, of Sterling House, Fulbourne Road, London, E17 4EE.

## 2. The Data We Collect About You

We collect and process various types of data to provide and improve our service, ensure security, and meet our legal obligations. The data we collect can be grouped as follows:

- **Identity & Contact Data:** This includes your first name, last name, email address, and job title when you register for an account on the Tool.
- **Company Data:** This includes information you upload about your organisation. While most of this is corporate data, it may include personal data where it relates to an identifiable individual. Specifically, this may include:
  - **Social Metrics Data:** Information related to your employees, such as headcount, diversity statistics, or data related to community investment initiatives. We strongly advise that you anonymise or aggregate this data wherever possible before inputting it into the Tool.
  - **Supplier Data:** Contact details (such as name, email address, and phone number) for individuals at your supplier organisations, which you may upload to the "Supply Chain Hub".
- **Technical & Usage Data:** This includes information about how you access and use the Tool, such as your IP address, browser type, time zone setting, and actions taken on the platform. This data is used to ensure the security and performance of our service.
- **Marketing and Communications Data:** This includes your preferences in receiving marketing from us and your communication preferences.

We do not knowingly collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and

genetic and biometric data).

### 3. How We Use Your Personal Data

We use your personal data for the following purposes, based on a lawful basis for processing:

- **To Provide and Manage Your Account:** We use your Identity and Contact Data to create and manage your user account, provide you with access to the Tool, and communicate with you about service updates.
  - *Lawful Basis: Performance of a contract.*
- **To Power the Tool's Functionality:** Your Company Data, including any embedded personal data, is processed by our "Analysis & Footprinting Engine" to perform Life Cycle Assessments (LCAs) and calculate your organisation's sustainability footprint, in line with ISO standards and the GHG Protocol.
  - *Lawful Basis: Performance of a contract.*
- **To Improve Our Service:** We analyse Technical & Usage Data to understand how our users interact with the Tool, allowing us to improve functionality, develop new features, and enhance the user experience.
  - *Lawful Basis: Legitimate interests (to improve and develop our product).*
- **To Provide Customer Support:** We may use your Identity, Contact, and Usage data to investigate and resolve any issues or queries you have.
  - *Lawful Basis: Performance of a contract.*
- **To Ensure Security:** We monitor usage to prevent fraudulent activity and to keep our platform and your data safe and secure.
  - *Lawful Basis: Legitimate interests (to protect our business and your data).*
- **For Marketing:** Where you have given your consent, we may use your Identity and Contact Data to send you information about our products, features, and offers. You can withdraw this consent at any time.
  - *Lawful Basis: Consent.*

### 4. Data Sharing and Third-Party Processors

We do not sell your personal data. We may, however, share your data with trusted third-party service providers (known as "sub-processors") who help us to operate our business. These include:

- **Core Functionality Providers:** To perform the complex sustainability calculations, we share non-personally identifiable business and product data (such as bills of materials and production volumes) with our technical partners who operate the **OpenLCA API**, utilising the **Ecoinvent database**, and the **ReCiPe** and **AWARE** impact assessment methods. We do not share direct personal data like names or email addresses with these partners for calculation purposes.
- **Cloud & Hosting Providers:** We use third-party providers like [e.g., Amazon Web Services, Microsoft Azure] to host our platform and your data securely in the [e.g., UK/EEA].

- **Analytics Providers:** We use providers like [e.g., Google Analytics] to analyse usage of our platform.
- **Customer Support & CRM Providers:** We use platforms like [e.g., Zendesk, HubSpot] to manage customer communications.

We have Data Processing Agreements (DPAs) in place with all our sub-processors, ensuring they meet their obligations under UK GDPR and only process your data on our instructions.

## 5. International Data Transfers

Some of our external third-party providers may be based outside the United Kingdom (UK). Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The country has been deemed to provide an adequate level of protection for personal data by the UK Government.
- We use specific contracts approved for use in the UK which give personal data the same protection it has in the UK (such as the UK's International Data Transfer Agreement).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 6. Data Security

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way. We limit access to your personal data to those employees and third parties who have a business need to know.

## 7. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

Typically, this means we will retain your data for as long as you have an active account with us. After you close your account, we may retain your data for a period of up to [e.g., 6 years] to resolve disputes or comply with legal obligations.

## 8. Your Legal Rights

Under data protection law, you have rights including:

- **Right of Access:** To request a copy of the personal data we hold about you.
- **Right to Rectification:** To request correction of any inaccurate personal data.
- **Right to Erasure:** To request that we delete your personal data.

- **Right to Restrict Processing:** To request that we suspend the processing of your personal data.
- **Right to Data Portability:** To request the transfer of your personal data to you or a third party.
- **Right to Object:** To object to our processing of your personal data (e.g., for direct marketing).

To exercise any of these rights, please contact us at [Your Contact Email/Data Protection Officer's Email].

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## 9. Changes to This Privacy Policy

We may update this policy from time to time. We will notify you of any significant changes by email or through a notification on our platform.

## 10. Contact Us

If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Officer at:

Email: [tim@avallen.solutions](mailto:tim@avallen.solutions)

Address: Avallen Solutions Ltd, Sterling House, Fulbourne Road, London, E17 4EE