

1. Introduction

- 1.1. Aurora Energy Research Limited, and all its subsidiaries (collectively, “Aurora”, “Aurora Group”, “we,” “our,” or “us”) are committed to protecting your privacy and ensuring that your personal data is handled responsibly. This Privacy Notice (“Notice”) outlines how we collect, use, share, and safeguard your information when you interact with us.
- 1.2. Aurora is committed to ensuring that your privacy is protected. Should we ask you to provide certain personal data by which you can be identified when interacting with us either directly or via our website, you can be assured that it will only be used in accordance with this Notice.
- 1.3. Aurora may change this Notice from time to time by updating this page. You should check this page regularly to ensure that you are happy with any changes.

2. Who we are

- 2.1. Aurora Group includes the following:
 - (a) Emperor UK Topco Limited, United Kingdom;
 - (b) Aurora Energy Research Limited, United Kingdom;
 - (c) Aurora Energy Research GmbH, Germany;
 - (d) Aurora Energy Research, Single Member Company, Greece;
 - (e) Aurora Energy Research K.K, Japan;
 - (f) Aurora Energy Research LLC, United States of America;
 - (g) Aurora Energy Research PTE. Ltd, Singapore;
 - (h) Aurora Energy Research Pty Ltd, Australia;
 - (i) Aurora Energy Research SAS, France;
 - (j) Aurora Energy Research Investigación y Análisis, S.L.U, Spain;
 - (k) Aurora Energy Research S.R.L, Italy;
 - (l) Aurora Energy Research AB, Sweden;
 - (m) Aurora Energy Research Brazil Limitada, Brazil;
 - (n) Aurora Energy Research India Private Limited, India; and
 - (o) Aurora Energy Research SpA, Chile.
- 2.2. We have appointed a Data Protection Officer. If you have any questions about this Notice or our data protection practices, please contact the Data Protection Officer.
- 2.3. Our Data Protection Officer can be contacted at:

Email address: data_protection@auroraer.com

Postal address: Aurora Energy Research Limited. St Aldates Chambers, 109-113 St Aldates, Oxford, OX1 1DS, UK

3. What we collect

- 3.1. Personal data means any information about an individual from which that person can be identified, or any information about an identifiable individual. It does not include data which cannot be connected to an identifiable individual (anonymous data).
- 3.2. There are different types of personal data about you that we might collect, use, store, or transfer. We have grouped these as follows, and provided some illustrations of the type of personal data which might fall into each grouping:
 - (a) Identity Data could include your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth or gender;

- (b) Contact Data could include your billing address, delivery address, email address, telephone numbers or another unique identifier for use with electronic communications;
- (c) Financial Data could include bank account and payment card details;
- (d) Transaction Data could include details about payments to and from you and other details of products and services you have purchased from us;
- (e) Images and Recordings Data, we collect images and recordings of you when you enter into our premises in an area in which we operate CCTV. Signs will be placed around the building to notify you of areas where CCTV is operated. Where you attend an event run by us, we may process images or recordings of you;
- (f) Technical Data could include your internet protocol (IP) address, your login data, browser type and version, time zone setting, and location, browser plug-in types and versions, operating system and platform, and information about other technology on the devices you use to access this website;
- (g) Profile Data could include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- (h) Usage Data could include information about how you came to and leave our website, and how you use our website, products, and services;
- (i) Marketing and Communications Data could include your preferences in receiving marketing from us and your communication preferences;
- (j) Derived Data, derived from correlating and combining different personal data collected under various heads, for instance, as part of marketing and communications data, profile data; and
- (k) Social Media Data could include names, usernames, any information on your interaction with us such as comments, likes, shares and direct messages.

3.3. We may also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will only be used in accordance with this Notice.

3.4. We do not usually expect to 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), nor do we collect any information about criminal convictions and offenses.

3.5. Neither our website nor our services are intended for children, and we do not expect to process the data of anyone under 18 years of age.

4. How we collect your personal data

4.1. We use different methods to collect data from and about you including through:

- (a) Direct interactions: You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - (i) ask for information about our products or services;
 - (ii) create an account on our Aurora EOS platform;
 - (iii) express an interest in a career with us;
 - (iv) request marketing emails/material to be sent to you;

- (v) give us feedback or contact us;
- (vi) fill in our contact form on the Aurora Energy Research website;
- (vii) sign up to, or attend one of our events;
- (viii) contact us via social media; and
- (ix) enter onto our premises where CCTV is in operation.

If any personal data that you have provided to us subsequently changes, we will endeavour to update the records as quickly as we can, so please let us know promptly.

- (b) **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our [cookie policy](#) for further details.
- (c) **Generated Data:** We may generate Transaction, Usage, Marketing, and Communications Data or Derivative Data about you, by way of records of the direct and automated interactions that you have with us or our website.
- (d) **Third parties:** We may receive personal data about you from various third parties as set out below:
 - (i) analytics providers;
 - (ii) lead generators and referrers; and
 - (iii) search information providers.

5. What we do with the personal data we gather

5.1. We require this personal data to understand your needs and provide you with a better service, and in particular for the following reasons:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or a user of the Aurora EOS platform	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide you with access to our products and services)
To administer aspects of our contract with you including: (a) Manage billing and invoicing together with associated payments (b) Collect and recover money owed to us (c) Internal record keeping	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for our legitimate interests (the good administration of our business and supporting regulatory compliance)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or this Notice</p> <p>(b) Asking you to leave a review or take a survey or provide feedback on our products, services and website</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Derivative</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services in order to improve them)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Profile</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To customise the website content to your preferences and to email marketing to you and measure or understand the effectiveness of the advertising we serve to you</p> <p>To improve our products, services</p> <p>To contact you with invitations to/information about events that we organize or participate in</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p> <p>(g) Derivative</p>	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business, and to inform our marketing strategy) where you have already purchased a similar product/service from us</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Communicate with you via social media	(a) Technical (b) Social Media Data	Consent
Administering and promoting our events	(a) Identity (b) Contact (c) Marketing and Communications (d) Images and Recordings Data	Consent
To use data analytics/analytic cookies and similar technologies to improve our website, products/services, marketing, customer relationships, and experiences	(a) Technical (b) Usage (c) Profile	Consent
To make suggestions and recommendations to you about new products, special offers, or other information that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) Derivative	Necessary for our legitimate interests (to develop our products/services and grow our business)
To prevent unauthorised access to the workplace and protect individuals and assets inside this area. CCTV will support the identification of any individuals responsible for property related crimes and other wrongdoings (if any) and will enhance the	(a) Images and Recordings Data	Necessary for our legitimate interests (to secure our business and prevent unauthorised access to the workplace)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
exercise of Aurora’s defensive right in court or in any other competent venue		

6. Security & Retention

- 6.1. We have built our website using industry-standard encryption and authentication tools to protect the security of personal data.
- 6.2. We also use technological measures to help protect personal data. Information collected through the website is encrypted before it travels over the Internet using industry-standard technology for conducting secure online transactions. Unfortunately, because of its nature, we cannot guarantee against the loss or misuse of personal data transmitted unencrypted over the Internet.
- 6.3. We will only keep 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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 6.4. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 6.5. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. How we use cookies

- 7.1. Aurora uses analytics cookies to compile usage reports and to help improve the company website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.
- 7.2. Aurora uses security cookies to help identify trusted web traffic from shared IP addresses, it is essential in helping us identify trusted web traffic to the company’s website.
- 7.3. To learn more about Aurora’s cookie policy, read [here](#).

8. Links to other websites

8.1. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any personal data which you provide whilst visiting such sites, and such sites are not governed by this Notice. You should exercise caution and look at the Notice applicable to the website in question.

9. Controlling your personal data

9.1. You may choose to restrict the collection or use of your personal data in the following ways:

- (a) if you have previously agreed to us using your personal data for direct marketing purposes, you may change your mind at any time by clicking the link in any email that you receive from us; or
- (b) you can also write to or email us by using the contact details provided in paragraph 2.3.

9.2. In addition, under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to either our Data Protection Officer or to the applicable local data protection authority. For example, in the UK the Information Commissioner's Office is the UK supervisory authority for data protection issues (www.ico.org.uk). These rights include the right to:

- (a) Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) Object to processing of your personal data, where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) if you want us to establish the data's accuracy;
 - (ii) where our use of the data is unlawful but you do not want us to erase it;

- (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims; or
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) Request the transfer of your personal data to you or to a third party (right to data portability). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9.3. Process of exercising your rights

- (a) **HOW TO EXERCISE YOUR RIGHTS:** Please contact us per the details provided in para 2.3. Please mark any correspondence “Data Subject Rights Request”.
- (b) **NO FEE USUALLY REQUIRED:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- (c) **WHAT WE MAY NEED FROM YOU:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- (d) **TIME LIMIT TO RESPOND:** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. We will promptly correct any personal data found to be incorrect. In this case, we will notify you and keep you updated.

10. California State Privacy Rights (only applicable to California Residents)

10.1 This section applies to residents of California who wish to exercise their rights under the California Consumer Privacy Act, this includes:

- (a) The right to know about the personal information we collect about you and how it is used and shared;
- (b) The right to have your personal information deleted (with some exceptions);
- (c) The right to correct inaccurate personal information that we have about you;
- (d) The right to opt-out of the sale or sharing of their personal information if we have sold or shared personal information;
- (e) The right to non-discrimination when you exercise your right under the California Consumer Privacy Act; and
- (f) The right to limit the use and disclosure of your sensitive personal information that we may collect about you

10.2 Please contact us at data_protection@auroraer.com or write to us at Aurora Energy Research LLC, 300 Frank H. Ogawa Plaza, Suite 370, Oakland, CA 94612. Please mark any correspondence “CCPA Data Subject Rights Request”.

10.3 We will try to respond to your request within 45 days.

11. Sharing your personal data

11.1. We may disclose your personal data to our agents or sub-contractors for the purposes identified above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not generally allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

11.2. We will not sell, distribute, or lease your personal data to third parties unless we have your permission or are required by law to do so. We may use your personal data to send you promotional information about third parties which we think you may find interesting or share your data directly with them to enable them to do so, if you tell us that you wish this to happen. You can change your mind about this at any time.

11.3. We may provide your personal data (to the limited extent necessary) to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

11.4. We may disclose your personal data without your permission to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise, or defend its legal rights.

12. International Transfers

12.1. We share your personal data within the Aurora Group. This may involve transferring your data outside the country where it was originally collected for example outside the United Kingdom and/or the European Economic Area (EEA). In addition, some of our external third parties are based outside the UK and/or EEA so their processing of your personal data will involve a transfer of data outside the UK and/or the EEA.

12.2. Whenever we transfer your personal data out of the country from where it was collected, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data under applicable data protection laws.
- (b) Where we use certain service providers, we may use specific contracts in line with applicable data protection laws, for example, those approved by the European Commission or the UK Secretary of State (as applicable), and which provide personal data with the same level of protection it has under applicable data protection laws such as the GDPR or the UK Data Protection Act.

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

13. Further Information on Contacting Us

13.1. If you have any questions about this Notice or the processing of your personal data by Aurora please contact:

Email address: data_protection@auroraer.com

Postal address: Aurora Energy Research Limited, St Aldates Chambers, 109-113 St Aldates, Oxford, OX1 1DS, UK

13.2. Where we process your personal data in the European Economic Area our nominated representative is Aurora Energy Research GmbH, Kottbusser Damm 25/26, 10967 Berlin.