

Eli Go Privacy Policy

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1. Definitions

As the operators of elionboarding.com and the *Eli Onboarding* and *Eli Go* Platforms, CA3 registered as CATHree Ltd in England and Wales with Company Registration Number 07812353 and having its registered office address at Unit 117, The Record Hall, 16-16A Baldwin's Gardens, London, EC1N 7RJ, UK ("**We**", "**Us**", "**CA3**") is committed to protecting and respecting users' privacy.

2. Policy Overview

This privacy policy explains how CA3 collects, uses, stores, and protects personal data in connection with *Eli Go*. This policy is addressed to you, the client purchasing or using *Eli Go*, and covers two categories of personal data:

- **Service Data** - personal data relating to you and your organisation that we collect in order to provide, manage, and administer your *Eli Go* subscription, including payment information.
- **User Data** - personal data relating to your users (your employees, new joiners, or candidates) that is processed through the *Eli Go* platform as part of your onboarding workflows.

These two categories are subject to different data protection obligations, and this policy sets out those obligations clearly for each.

For Service Data, CA3 acts as the Data Controller. For User Data, CA3 acts as a Data Processor on your behalf (as the Data Controller), except in limited circumstances described in Section 5.2 where CA3 acts as an independent Data Controller.

3. GDPR and UK GDPR Compliance

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Although the UK is no longer an EU member state, the UK's DPA 2018 has enacted the EU GDPR's requirements into UK law. With effect from 1 January 2021, the DPPEC Regulations 2019 amended the DPA 2018 and merged it with the EU GDPR requirements to form the UK GDPR. CA3 complies with applicable UK GDPR regulations as both a data processor and controller.

As a client purchasing *Eli Go*, you also carry your own data controller responsibilities in relation to your users' data. This policy, together with our Data Processing Agreement (available on request), sets out the basis on which we act on your behalf.

4. Part A — Service Data

This section applies to personal data relating to you and your organisation. CA3 is the Data Controller for Service Data.

4.1 Service Data We Collect

In connection with your purchase and use of *Eli Go*, we collect and process the following categories of personal data about you:

- Name of the purchasing contact
- Business email address and telephone number
- Company name and registered address
- Records of your interactions with CA3, including support requests, communications, and account activity
- Log data, including IP address, browser type, and access timestamps, generated when you use *Eli Go* or our websites

No personal email addresses, personal social media profiles, or personal website links are collected or processed.

4.2 Payment Data

Eli Go is a self-serve product and payment is collected at the point of purchase. Payment card data and billing information are processed on our behalf by third-party payment providers. CA3 does not store, host, or directly process raw payment card data. The relevant payment provider acts as a Data Processor under contract with CA3 and is subject to Payment Card Industry Data Security Standards (PCI DSS).

CA3 remains the Data Controller for payment-related personal data (such as your name, billing address, and transaction records). The payment provider processes this data on our instructions for the purposes of collecting payment and managing your subscription.

Note: Certain payment providers may also act as independent Data Controllers for their own fraud prevention and regulatory compliance purposes. Please refer to the payment provider's own privacy policy for details of their independent processing activities.

4.3 Lawful Basis for Processing Service Data

CA3 processes Service Data on the following lawful bases under UK GDPR:

Processing Activity	Lawful Basis
Administering your <i>Eli Go</i> account and subscription	Performance of a contract (Article 6(1)(b))
Processing payment and managing billing	Performance of a contract (Article 6(1)(b))
Providing customer support and responding to enquiries	Performance of a contract (Article 6(1)(b))
Complying with legal and regulatory obligations (e.g. tax, financial records)	Legal obligation (Article 6(1)(c))

Communicating product updates or service changes	Legitimate interests (Article 6(1)(f))
Analysing platform usage to improve Eli Go	Legitimate interests (Article 6(1)(f))
Sending marketing communications (where opted in)	Consent (Article 6(1)(a)) — see CA3-15

4.4 How We Use Your Service Data

We use Service Data to:

- Set up and manage your *Eli Go* account
- Process payments and manage your subscription
- Provide technical support and respond to your requests
- Notify you of material changes to *Eli Go* or this policy
- Monitor and improve platform performance and security
- Comply with our legal and regulatory obligations

4.5 Who We Share Service Data With

CA3 does not sell, rent, or lease Service Data to third parties. We may share Service Data with trusted third-party service providers who assist us in operating *Eli Go*, including:

- Payment processing providers
- Hosting and infrastructure providers
- Customer support and CRM platforms
- Analytics and monitoring tools

All third-party processors are bound by Data Processing Agreements requiring them to process data only on CA3's instructions and to maintain appropriate security measures. CA3 does not transfer Service Data outside the UK or European Economic Area (EEA).

4.6 Service Data Retention

We retain Service Data for as long as you remain a customer of *Eli Go*. Upon termination of your subscription:

Data Category	Retention Period After Termination
General Service Data (account details, contact information, correspondence)	Up to 5 years
Payment Data (card details and transaction records held by payment processors)	Deleted or anonymised within 90 days, subject to statutory obligations

Retention note: Some financial and transactional records may need to be retained for longer periods to comply with HMRC or other regulatory requirements. In such cases, access to this data will be restricted and it will be used only for those compliance purposes.

4.7 Your Rights (Clients)

As a client, you have the following rights under UK GDPR in relation to your Service Data:

- **Access** – You have the right to request a copy of the personal data we hold about you.
- **Rectification** – You have the right to request correction of inaccurate or incomplete data.
- **Erasure** – You have the right to request deletion of your personal data, subject to our legal obligations.
- **Restriction of Processing** – You have the right to request that we restrict processing of your data in certain circumstances.
- **Data Portability** – You have the right to receive your personal data in a structured, machine-readable format where processing is based on contract or consent.
- **Right to Object** – You have the right to object to processing based on legitimate interests.
- **Withdraw Consent** – Where processing is based on consent (e.g. marketing), you may withdraw consent at any time without detriment.

We will respond to all rights requests within one month. You also have the right to lodge a complaint with the Information Commissioner’s Office (ICO) www.ico.org.uk or by phone 0303 123 1113.

5. Part B – User Data

This section applies to personal data relating to your users - new joiners, candidates, employees and any other users - who access *Eli Go* as part of your onboarding processes. You, as the client, are the Data Controller for User Data. CA3 acts as the Data Processor on your behalf, except in the limited circumstances described in Section 5.2.

Your users’ data is processed solely to deliver the *Eli Go* onboarding experience as configured by you. CA3 does not use User Data for any other purposes, including marketing.

5.1 What User Data Is Collected

User Data collected within *Eli Go* falls into the following categories:

Type	Description & Examples
Type 1 – Profile Data	Provided by your Applicant Tracking System (ATS) or HR Information System (HRIS). Examples: name, email address, business area.
Type 2 – Uploaded Files	Files containing personal data that your users upload to <i>Eli Go</i> , as required by your onboarding process. Examples: proof of address, right to work documentation. This data type may not be enabled in your configuration.

Type 3 — Profile Picture	A profile picture uploaded directly by the user, or connected from their Facebook or X account. CA3 acts as independent Data Controller for this data type only.
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If you are unsure which data types are active in your Eli Go configuration, please consult your account settings or contact us by raising a support ticket.

5.2 Control of User Data

The data controller/processor responsibilities for each User Data type are as follows:

Data Type	Data Controller	Data Processor
Type 1 — Profile Data	You (the client)	CA3
Type 2 — Uploaded Files	You (the client)	CA3
Type 3 — Profile Picture	CA3 (independent controller)	N/A

For Types 1 and 2, because you are the Data Controller, your users' rights (to access, rectify, or delete their data) should primarily be directed to you. CA3 will support you in fulfilling these requests in accordance with our Data Processing Agreement.

For Type 3 (profile picture), CA3 is the independent Data Controller. Your users can view, update, or delete their profile picture directly within *Eli Go*.

5.3 Use of User Data

User Data is used solely for the purposes of onboarding your users into your organisation via *Eli Go*, as directed by you. Specifically:

- To deliver onboarding content and workflows as configured by you
- To enable your users to complete tasks and upload required documents
- To provide you with onboarding progress and completion data
- To comply with legal terms governing the *Eli Go* service
- To protect the rights, safety, and security of the platform

Profile picture data (Type 3) is used solely to display the user's profile within *Eli Go*.

Eli Go may display a social media feed for your organisation (sourced from LinkedIn, Instagram, Facebook, or X). CA3 does not store any personal data in connection with displaying these feeds or walls. Posts are held temporarily in memory only and are not written to disk or retained after the session.

5.4 User Data Storage

User Data is stored securely within the UK. All data is encrypted in transit and at rest.

5.5 User Data Retention

The retention period for User Data is determined by you, as the Data Controller. CA3 will retain User Data on the platform for as long as you maintain an active *Eli Go* subscription and have not instructed deletion.

Upon termination of your *Eli Go* subscription, all User Data will be deleted within 30 days, unless you request earlier deletion or unless a longer retention period is required by applicable law.

For profile picture data (Type 3), where CA3 is the independent Data Controller, CA3 will also delete this data within 30 days of termination of service.

Your responsibility: As the Data Controller for Types 1 and 2, you are responsible for ensuring that your retention and deletion instructions to CA3 align with your own privacy obligations to your users. Please contact us if you wish to configure specific retention or deletion schedules.

5.6 Your Users' Rights

Your users have the following rights under UK GDPR in relation to their personal data:

Right	How It Is Exercised in Eli Go
Access - right to request a copy of their data	Types 1 & 2: your users should contact you as Data Controller. They can also view their data in their user profile in the system. Type 3: users can view their profile picture from their profile in Eli.
Rectification - right to correct inaccurate data	Types 1 & 2: your users should contact you. Type 3: users can update their profile picture directly in Eli.
Erasure - right to request deletion	Types 1 & 2: your users should contact you. Type 3: users can delete their profile picture directly in Eli.
Restriction of processing	Your users should contact you as Data Controller.
Portability	Your users should contact you as Data Controller.
Right to object	Your users should contact you as Data Controller.

Your users may also raise concerns about CA3's processing directly with us at the contact details in the contact us section. Complaints can be directed to the Information Commissioner's Office (ICO).

6. Protection of Data

CA3 takes the security of all personal data very seriously. We maintain physical, organisational, and technical safeguards, which are subject to periodic review and improvement. These include:

- Encryption of data in transit (TLS) and at rest
- Access controls and role-based permissions
- Regular security assessments and monitoring – we are ISO27001:2022 certified
- Vendor due diligence and Data Processing Agreements with all third-party processors

An overview of our security practices can be found [on the website](#), or by contacting us directly.

7. International Transfers

CA3 does not transfer personal data (Service Data or User Data) outside the United Kingdom or European Economic Area (EEA). All data is hosted and processed within the UK.

8. Contact Us

The primary point of contact for all data protection matters relating to *Eli Go* is our Data Protection Officer.

Email: dpo@cathree.com or dpo@elionboarding.com

Post: CA3, Unit 117, The Record Hall, 16-16A Baldwins Gardens, London, EC1N 7RJ

9. Changes to This Policy

This privacy policy is effective as of April 2026. We reserve the right to update or change this policy at any time. Where changes are material, we will notify you by email or via the *Eli Go* platform. Continued use of *Eli Go* following notification of changes constitutes your acceptance of the revised policy.