

Aera Advisory Limited

Data Protection and GDPR Policy Statement

As part of our business administration, we manage data regarding our staff, contractors, clients, and co professionals. To this end, we have established this Data Protection and GDPR (General Data Protection Regulation) Policy to assist us in maintaining compliance.

Compliance with this Data Protection and GDPR Policy is mandatory for all employees of Aera Advisory and regards all data management requirements of Aera Advisory. Our GDPR review process evaluates the Company's processes and regulatory requirements on an ongoing basis. In managing our data protection and GDPR concerns, we are committed to:

- Processing data fairly and lawfully;
 - Holding data for specific purposes relevant to the needs of the business and the welfare of persons only;
 - Not disclosing data for a need not compatible with the purpose for which it is held.
 - Ensuring that, within reason, data is accurate and up to date;
 - Ensuring that data is only held for specified periods where required / applicable;
 - Informing staff and contractors if personal data is held on them;
 - Ensuring that all Aera Advisory system users are aware that all data held on Aera Advisory's computers and server is the property of Aera Advisory and must be returned or deleted, on request;
 - Providing access to data for a specific individual or organisation, and, where appropriate, working with said persons or organisations to have the data corrected or erased;
 - Operating and continually improving our GDPR related data management systems with a view to enhancing performance and security throughout our operations and for elements within our control on an ongoing basis;
 - Ensuring that, where paper files are held, adequate security is in place;
 - Securing electronic data held on password protected IT systems;
 - Ensuring that staff and contractors are aware that they are strictly forbidden to make contact with or communicate with any member of the press or media or anyone so connected on behalf of Aera Advisory unless they have obtained the prior written permission of the Managing Director;
 - Reviewing this policy annually to ensure it remains current and in line with planned future activities; and
 - Ensuring the competence of our employees through the provision of adequate information, and effective instruction, training and supervision.
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We are committed to providing adequate organisation, arrangements, and financial and physical resources to facilitate the successful delivery of this Data protection and GDPR Policy.



Stuart McGowan, Managing Director, February 2026