



## PRIVACY POLICY

### 1. Privacy

- a. **BACKGROUND:** Axada Limited understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

2. This Policy applies to Our use of any and all data collected by us in relation to your use of Our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and/or You will be required to read and accept this Privacy Policy when signing up for an Account]. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 3. Scope – What Does This Policy Cover?

- a. This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Data Do We Collect?

- a. Some data will be collected automatically by Our Site other data will only be collected if you voluntarily submit it, for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data:
  - i. [name;]
  - ii. [date of birth;]
  - iii. [gender;]
  - iv. [business/company name]
  - v. [job title;]
  - vi. [profession;]

- vii. [contact information such as email addresses and telephone numbers;]
- viii. [demographic information such as post code, preferences and interests;]
- ix. [financial information such as credit / debit card numbers;]
- x. [IP address (automatically collected);]
- xi. [web browser type and version (automatically collected);]
- xii. [operating system (automatically collected);]
- xiii. [a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);]

## **5. How Do We Use Your Data?**

- i. All personal data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see section 6, below.
- ii. We use your data to provide the best possible products and services to you. This includes:
- iii. Providing and managing your Account;
- iv. Providing and managing your access to Our Site;
- v. Personalising and tailoring your experience on Our Site;
- vi. Supplying Our products and services to you;
- vii. Personalising and tailoring Our products and services for you;
- viii. Responding to communications from you;
- ix. Supplying you with email New, Updates and services that would benefit you that you have subscribed to (you may unsubscribe or opt-out at any time).
- x. Market research;
- xi. Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- xii. With your permission which may be given by agreeing to these terms and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email and/or telephone and/or text message and/or post with information, news and offers on Our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
- xiii. Advertisers whose content appears on Our Site may engage in what is known as “behavioural advertising” – advertising which is tailored to

your preferences, based on your activity. Your activity is monitored using Cookies, as detailed. You can control and limit your data used in this way by adjusting your web browser's privacy settings. Please note that We do not control the activities of such advertisers, nor the information they collect and use. Limiting the use of your data in this way will not remove the advertising, but it will make it less relevant to your interests and activities on Our Site.

## **6. How and Where Do We Store Your Data?**

- i. We only keep your data for as long as We need to in order to use it as described above, and/or for as long as We have your permission to keep it,
- ii. Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998. Such steps may include, but not be limited to, the use of legally binding contractual terms between Us and any third parties We engage and the use of the EU-approved Model Contractual Arrangements. Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- iii. Steps We take to secure and protect your data include:
- iv. Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

## **7. Do We Share Your Data?**

- i. We may share your data with other companies in Our group. We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- ii. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with

third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.

- iii. In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

## **8. Changes to Our Privacy Policy**

- a. We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date