

Privacy Policy

Praelex Limited (“Praelex”) is committed to protecting and respecting your data privacy. Praelex takes its responsibility with regard to the management of personal data very seriously and we do not take lightly the trust you have reposed in us, in providing us your personal information when using our website. This Privacy and Cookies Notice (“Notice”) together with and any other documents referred to therein sets out the basis on which the personal data collected from you, or that you provide to Praelex will be processed by Praelex when you use our website at praelex.net (“Website”) or any of our services, or where we enter into any other business relationship with you. Please read the following carefully to understand our practices regarding your personal data.

1. Personal Information/data

Information/data Praelex collects from you

- 1.1 Praelex collects and processes some or all of the following types of information from you in the course of your use of the Website, our provision of our services, or otherwise conducting any business relationship with you:
 - a. information that you provide by filling in forms on the Website. This includes but not limited to information provided at the time of registering to use the Website, subscribing to our services (including but not limited to news alerts), or requesting further information or services. We may also ask you for information when you complete a survey or enter contests.
 - b. personal details such as name, email address, place of work, position, country, telephone number or any information you provide when using the Website, completing our survey forms or using our services
 - c. in respect of the personnel engaged by our customers and suppliers (or prospective customers and suppliers), and with whom we come into contact in connection with the relationship between us and our customer and supplier.
 - d. record of correspondences we have with you
 - e. details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
- 1.2 Please note that the provision of your name, email address, place of work, position, country and telephone number is required for registration to use the Website. Your name and email address are also required for news alerts. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

Information Praelex collects from other sources

- 1.3 We use public sources such as LinkedIn to obtain the contact details of individuals who we reasonably believe may have an interest in our products and services

2 Usage of your personal information/data

Provision of data to our content contributors

- 2.1 We operate a free-to-view business model. Therefore, we hope that our registered users will support us in maintaining this model by consenting to our use of your personal data as described below-
- 2.2 Our Our services are paid for by content providers (“Contributors”) in exchange for Praellex providing them with access to information about who accesses their content. Once personal data is transferred to our content providers, they become a data controller of this personal data. They use it to, (a) measure what they receive from their articles, as a form of market research, and (b) provide Praellex users with information about their products and service.
- 2.3 The details of each content provider to which your personal data will be transferred to is clearly stated within the content that you access. For full details of how this content provider will use your personal data, you are advised to review each content provider’s Privacy Notice

Praellex’s use of your personal data

- 2.4 We use information held about you in accordance with the following “legal bases” and for the following purposes:
 - a. to provide you with our Website and associated functionality (such as password reminders) and to carry out any other obligations arising from any contracts entered into between you and Praellex. We rely on “performance of a contract with you” as the legal basis for this processing
 - b. to provide you with news alerts. We rely on “your consent” as the legal basis for this processing.
 - c. to notify you about changes to our service. We rely on “performance of a contract with you” as the legal basis for this processing.
 - d. to ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website. We rely on “legitimate interest” as the legal basis for this processing, and the legitimate interest is the maintenance and improvement of our Website for the benefit of all our users.
 - e. to allow you to participate in interactive features of our service, when you choose to do so

3 Personal Data Protection Principles

When we process your personal data, we are guided by the following principles, which require personal data to be:

- a. processed lawfully, fairly, in a transparent manner and with respect for the dignity of the human person
- b. collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- d. accurate and where necessary kept up to date
- e. removed or not kept in a form which permits identification of data subject for longer than is necessary for the purpose for which the personal data is processed
- f. processed in a manner that ensures its security, using appropriate technical and organisational measures to protect against accidental loss, destruction or damage.

4 Third Party Access

4.1 We routinely disclose your personal data to third parties in the following limited circumstances:

- a. when your consent has been obtained
- b. when we provide such information to our trusted business partners, affiliates, or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- c. in the event that access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce applicable terms of service, including investigation of potential violations thereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to the rights, property or safety of Praelix, its users or the public as required or permitted by law.
- d. when we sell or buy any of our business or assets.

4.2 Other than as set out above and save insofar as is necessary for us to carry out our obligations arising from any contracts entered into between you and us, we will not share your data with third parties.

5 User responsibility

You are required to acquaint yourself with this policy and to ensure that the information you provide to us is complete, accurate and up to date.

6 Data Security

- 6.1 Praelix implements and maintains appropriate measures to ensure that personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it and those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 6.2 In safeguarding your personal data, we also implement the use of encryption and pseudonymisation where appropriate. This also includes protecting the confidentiality, integrity and availability of personal data. We regularly evaluate and test the effectiveness of these safeguards to ensure security of our processing of your personal data.
- 6.3 Unfortunately, the transmission of information via the internet is not completely secure. Although, we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website. Please note that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security measures to prevent unauthorised access.
- 6.4 The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites

Keeping your personal data up to date

- 6.5 If your personal details change, you may update them by accessing the relevant page of the Website. If you have any questions about how we use data collected which relates to you, please contact us by emailing us at (provide details)
- 6.6 We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to us, in order to ensure that the personal data we hold about you is as accurate and up to date as possible.

7 Privacy Violation

- 7.1 We have procedures in place to deal with any suspected personal data breach. Hence, we will keep you apprised of any personal data breach and notify you of the steps we have taken to remedy the breach and the security measures we have applied to render your personal data unintelligible.
- 7.2 All suspected breach of personal data will be remedied within one month from the date of the report of the breach. If you suspect that any breach to your personal data has occurred, kindly contact us immediately at (provide details).

- 7.3 Praelex will not be responsible for any personal data breach arising from;
- a. an event which is beyond the control of Praelex;
 - b. an act of threats of terrorism;
 - c. an act of God (such as but not limited to fires, explosions, earthquakes, drought, floods) which compromises Praelex's data protection measures;
 - d. war, hostilities (whether war is declared or not), invasion, act of foreign enemies, mobilisation, requisition, or embargo;
 - e. rebellion, revolution, insurrection, military or usurped power, or civil war which compromises Praelex's data protection measures;
 - f. the transfer of your personal data to a third party on your instructions; and
 - g. the use of your personal data by a third party designated by you

8 Privacy Policy changes

We reserve the right to modify this Notice at any time. The changes we may make to our Notice in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied Privacy Notice

9 Use of Cookies and IP Addresses

- 9.1 We may collect information about your mobile phone, computer or other device from which you access the Website including where available, your IP address, operating system and browser type, for (a) systems administration and (b) to report aggregate information to third parties affiliates. This is statistical data about our users' browsing actions and patterns and does not identify any individual. We may, however, use such information in conjunction with the data we have about you to track your usage of our services
- 9.2 Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website. It also allows us to improve the Website. By using our Website, you agree to our use of cookies as more specifically set out below-

Cookies

- 9.3 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer subject to your consent. Cookies contain information that is transferred to your computer's hard drive
- 9.4 The cookies we use include:

- a. “Analytical” cookies which allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This assists us to improve the way our Website works.
- b. “Strictly necessary” cookies which are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- c. “Functionality” cookies which are used to recognise you when you return to our Website. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).
- d. “Targeting” cookies which are used to record your visit to our Website, the pages you have visited and the links you have followed to our affiliates websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose

9.5 Please note that third party affiliates may also use cookies, of which we have no control

9.6 You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies including essential cookies, you may not be able to access all or parts of the Website. Therefore, unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Website.

10 How to contact us

For any enquiries, questions, comments and requests except where specified above regarding this Privacy and Cookies Notice, please do not hesitate to contact us via (provide details).