

# Predixa Privacy Policy Statement

Last revised: 20 April 2021

## Summary

This privacy policy statement applies to Predixa Technologies FZ-LLC with registered office address at HD12B, In5 Tech, Dubai Internet City, Dubai, United Arab Emirates.

Predixa operates internationally, including countries with specific privacy and data protection regulation such as GDPR, and is committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

The privacy notice below explains what information we gather about you, what we use it for and who we share it with. It also sets out your rights and who you can contact for more information or queries.

## Information about you that we process

We may process information about you that: (i) you provide to us, (ii) that we obtain from third parties or (iii) that is publicly available. This information may include your name, age, gender, date of birth and contact details. It may also include 'sensitive' or 'special categories' of personal data, such as dietary requirements or mobility information. For a more detailed description of the information about you that we may process, [please click here](#).

## How we use information about you

We collect and process information about you and/or your business to enable us, Predixa, and other members of the Predixa Network to:

- provide our services to you or our clients.
- to enable us to provide you with information that we think may be of interest to you; and
- to meet our legal or regulatory obligations.

For a more detailed description of how we use information about you, [please click here](#).

When we send you information we think you might be interested in, you have the right to unsubscribe at any time by contacting us as [set out here](#), or by following the unsubscribe instructions in our communications.

## Sharing and transferring your information

We may share information about you across Predixa's Network, and with some third parties. For more information [click here](#).

We may transfer some information about you to countries outside the European Economic Area that have less stringent data protection laws. When we do this, we will make sure your information remains adequately protected. For more information [click here](#).

## Your rights

Your rights under data protection laws include the right to: 1) request copies of your data; 2) request correction of your data; 3) request erasure of your data; 4) object to us processing your data; and 5) ask us to restrict the processing. For more information about your privacy rights [click here](#).

## Contact points

If you have any questions or comments about privacy issues, or wish to exercise any of the rights set out above, please contact our Data Protection Officer, email [DPO@predixa.ai](mailto:DPO@predixa.ai)

## In this policy statement:

“**Data Protection Legislation**” means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection (including the UK Data Protection Act 2018).

“**Predixa Network**” means the partnerships that exist between Predixa and third parties who have a commercial agreement to enable collaborative work together,

“**Process**” means any operation performed on information about you, including to collect, record, organise, structure, store, alter, use, transfer, destroy or otherwise make available.

## 1. Who this privacy statement applies to and what it covers

We are committed to protecting your privacy and handling your information openly and transparently.

This privacy statement explains how we will collect, handle, store and protect information about you when:

- providing services to you or our clients;
- you use our Website; or
- performing any other activities that form part of the operation of our business.

When we refer to “our Website” or “this Website”, we mean the specific webpages of [www.predixa.ai](http://www.predixa.ai)

This privacy statement also contains information about when we share your personal data with other third parties (for example, our service providers).

In this privacy statement, your information is sometimes called “personal data”. We may also refer to “processing” your data, which includes handling, collecting, protecting and storing it.

## 2. What personal data we collect

We may collect, record and use your personal data in physical and electronic form, and will hold, use and otherwise process that data in line with the Data Protection Legislation and as set out in this statement.

When we provide services to you or our clients and discuss possible services we might provide, we will process personal data about you. We may also collect personal data from you when you use our website or applications.

We may process your data because:

- you give it to us (for example, in a form on our Website or for your required services);
- other people give it to us (for example, your adviser, or third-party service providers that we use to help operate our business); or
- it is publicly available.

We may also collect personal information if you register for the Website using a third party social Network account (e.g., LinkedIn, Facebook, and Twitter). For example, the Website may allow you to login using your social Network account credentials. We may collect the user name associated with that social media account and any information or content you have permitted the social media Network to share with us, such as your profile picture, email address, and birthday. The information we collect may depend on the privacy settings you have with the social Network site, so please review the privacy statement or policy of the applicable social Network site. When you access the Website through your social Network account, you are authorising us to collect and use your information in accordance with this privacy statement.

We may process personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience of this Website and to make sure that it is working effectively. For example, we (or our service providers) may use cookies (small text files stored in a user's browser) or Web beacons to collect personal data. More information on how we use these and other tracking technologies – and how you can control them – can be found in our [cookie notice](#).

The personal data we process may include your:

- name, gender, age and date of birth;
- contact information, such as address, email, and mobile phone number;
- country of residence;
- lifestyle and social circumstances (for example, your hobbies);
- family circumstances (for example, your marital status and dependents);
- employment and education details (for example, the organisation you work for, your job title and your education details);
- postings or messages on any blogs, forums, platforms, wikis or social media applications and services that we provide (including with third parties);
- IP address, browser type and language, your access times;
- information in any complaints you make ;
- details of how you use our products and services;
- CCTV footage and other information we collect when you access our premises; and
- details of how you like to interact with us, and other similar information relevant to our relationship.

The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about your:

- dietary requirements (for example, when Predixa would like to provide you with lunch during a meeting);
- health (for example, so that we can make it easy for you to access our buildings, products and services); and
- sexual orientation (for example, if you provide us with details of your spouse or partner).

We may also process personal data relating to ethnic or racial origin (for example, any multicultural Networks you belong to), or about your political opinions (inferred from information you give us about political associations you belong to or have donated to).

We will typically seek separate permission from you, or your employer, in writing to process these special categories of personal data.

If you choose not to provide, or object to us processing, the information we collect (see section 10 below), we may not be able to process your instructions or continue to provide some or all of our services to you or your client.

### 3. Personal data provided by or about third parties

When our client or another third party gives us personal data about you, we make sure they have complied with the relevant privacy laws and regulations. This may include, for example, that the client or other third party has informed you of the processing, and has obtained any necessary permission for us to process that information as described in this privacy statement.

If any information you give us relates to a third party, by providing us with such personal data you confirm that, in line with the above provisions, you have obtained any necessary permission to use it or are otherwise permitted to give it to us.

### 4. How we use your personal data

We process information about you and/or your business to enable us and other members of the Predixa Network to provide our services to you or our clients, and to meet our legal or regulatory obligations.

Your data, in particular any sensitive personal data, will **not** be shared with third parties unless Predixa has a need to do so in conjunction with an assignment on your behalf or there is a legal or regulatory requirement to do so. In addition, Predixa is committed to taking all reasonable precautions in ensuring sensitive personal data gathered from our clients and their employees is kept confidential, with access to such data restricted to only those within Predixa who require access to provide our services to you; please [click here](#) for more information.

**In the event that you, or your employer, consent to the sharing of your personal information with Predixa and any third parties**, we may use such data in the following ways:

#### *Use of personal data to provide services to our clients*

We may use your personal data to provide you or our clients or other third parties with services, and this includes using your personal data in correspondence relating to those services. That correspondence may be with:

- you;
- other third parties or other members of the Predixa Network;
- our service providers; or
- competent authorities.

Because we provide a range of services to our clients or other third parties, the way we use personal data in relation to our services also varies. For example, we might use personal data about:

- a client's employees to help in employee engagement;
- a client's employees and customers in the course of conducting an assessment;

#### *Use of personal data for other activities that form part of the operation of our business*

We may also use your personal data in connection with:

- legal or regulatory requirements;
- requests and communications from competent authorities;
- client account opening and other administrative tasks;
- financial accounting, invoicing and risk analysis;
- relationship management, which may involve:

- (a) sending you thought leadership or details of our products and services;

- (b) contacting you for feedback on services;
- (c) sending you event invitations; and
- (d) other marketing or research purposes;

- recruitment and business development, which may involve:
  - (a) the use of testimonials from a client's employees as part of our recruitment and business development materials (with that employee's permission); and
  - (b) the use of third-party data sources to help us verify and improve the information we hold about key business relationships with individuals;
- services we receive from our professional advisors, such as lawyers, accountants and consultants;
- investigating or preventing security incidents; or
- protecting our rights and those of our clients.

#### *Use of personal data collected via our Website*

In addition to the above, we may also use your personal data collected via our Website:

- to manage and improve our Website;
- to tailor the content of our Website to give you a more personalised experience;
- to draw your attention to information about our products and services that may be of interest to you; or
- to manage and respond to any request you submit through our Website.

### **5. The legal grounds we use for processing personal data**

We are required by law to set out in this privacy statement the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

- you have explicitly agreed to us processing your information for a specific reason;
- your employer has consented, on your behalf, to us processing your information for a specific reason;
- the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;
- the processing is necessary for compliance with a legal obligation we have such as keeping records for tax purposes or providing information to a public body or law enforcement agency; or
- the processing is necessary for the purposes of a legitimate interest pursued by us or a third party, which might be:

(a) to provide our services to you or our clients and other third parties and ensure that our client engagements are well-managed;

(b) to prevent fraud;

(c) to protect our business interests;

(d) to ensure that complaints are investigated;

(e) to evaluate, develop or improve our services or products; or

(f) to keep you or our clients informed about relevant products and services and provide you with information, unless you have indicated at any time that you do not wish us to do so.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because:

- you have given us your explicit consent to process that data;
- we are required by law to process that data in order to ensure we meet our legal obligations imposed on us;
- the processing is necessary to carry out our obligations under employment, social security or social protection law;
- the processing is necessary for the establishment, exercise or defence of legal claims; or
- you have made the data manifestly public.

Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

## 6. Sharing your personal data

In connection with any of the purposes outlined in the “How we use your personal data” [section 4](#), we may disclose details about you, with your consent, to:

- other members of the Predixa Network or third parties that provide services or online platforms to us and/or the Predixa Network e.g. Microsoft Corporation.
- competent authorities (including courts and authorities regulating us and other members of the Predixa Network);
- your employer and/or its advisers, or your advisers;
- anyone to whom we may transfer our rights and/or obligations;
- any other person or organisation after a restructure, sale or acquisition of any member of the Predixa Network, as long as they use your information for the same purposes we did;
- credit reference agencies or other organisations that help us make credit decisions and reduce the incidence of fraud; and
- other third parties that have a legitimate need to access personal data relating to you.

Our Website hosts various blogs, forums, wikis and other social media applications or services that allow you to share content with other users (collectively “Social Media Applications”). Any personal data that you contribute to these Social Media Applications can be read, collected and used by other users of the application. We have little or no control over these other users, so any information you contribute to these Social Media Applications might not be handled in line with this privacy statement.

## 7. Transferring your personal data outside the UK

Unless otherwise requested by you or your employer for your data to reside in a particular location, information we hold about you may be transferred to other countries:

- where we do business;
- which are linked to your engagement with us;
- from which you regularly receive or transmit information; or
- where our third parties conduct their activities.

These countries may have less stringent privacy laws than we do, so any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. In addition, a number of countries have agreements under which information is exchanged with other countries for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer your personal data outside the UK or the EEA, we will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the UK and EEA. We, or they, may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. We may also transfer your personal data when:

- the transfer is to a country deemed to provide adequate protection of your personal data by the European Commission; or
- where you have consented to the transfer.

If we transfer your personal data outside the UK or EEA in other circumstances (for example, because we have to by law), we will make sure it remains adequately protected.

We may share non-personal, anonymised and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional activity.

## **8. Protecting your personal data**

We use a range of measures to ensure we keep your personal data secure, accurate and up to date. These include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data to a 'need to know' basis;
- technological security measures, including fire walls, encryption and antivirus software; and
- physical security measures, such as security passes to access our premises.

The transmission of data over the internet (including by e-mail) is never completely secure. So although we use appropriate measures to try to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

## **9. How long we keep your personal data for**

We seek to ensure that we only keep your personal data for the longest of:

- the period necessary for the relevant activity or services;
- any retention period that is required by law; or
- the period in which litigation or investigations might arise in respect of the services.

In the event that you, or your employer, wishes to remove your personal data sooner than the above, we will make every effort to remove such data as quickly as possible, upon receipt of any such request in writing. Please note that such an action is irreversible, and may take up to 30 days before all traces, backups and associated logs have been purged.

## 10. Your rights

You have various rights in relation to your personal data. In particular, you have a right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;
- be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from where it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data; withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- ask us to stop or start sending you marketing messages at any time by using the contact details in [section 12](#) below; and
- object to our processing of your personal data.

If you would like to access or see a copy of your personal data, you must ask us in writing. We will endeavour to respond within a reasonable period, and in any event within one month in line with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

To help us ensure that your information is up to date, let us know if any of your personal details change using the contact details set out in [section 12](#).

You may also use the contact details in [section 12](#) if you wish to make a complaint relating to your privacy.

## 11. Sending you marketing information

We and other members of the Predixa Network may use your information from time to time to inform you by letter, telephone, email and other electronic methods about products and services (including those of third parties) that may be of interest to you.

You may, at any time, ask us not to send marketing information to you by following the unsubscribe instructions in communications from us, or contacting us in the way described in section 13 below.

## 12. Right to complain

If you wish to raise a complaint about how we are using your information, exercise any of the rights set out above, or if you have any questions or comments about privacy issues, you can contact us by:

- writing to Data Protection Officer, Predixa Technologies FZ-LLC, HD12B, In5 Tech, Dubai Internet City, Dubai, United Arab Emirates or
- sending an email to [DPO@predixa.ai](mailto:DPO@predixa.ai)

### **13. Changes to this privacy statement**

We may modify or amend this privacy statement from time to time.

When we make changes to this privacy statement, we will amend the revision date at the top of this page. The modified or amended privacy statement will apply from that date. We encourage you to review this statement periodically to remain informed about how we are protecting your information.