

Aserve Investigators Ltd Investigators & Summons Servers

Last updated: 14th February 2023.

Privacy Policy & Cookie Notice

At Aserve, we fully respect your right to privacy in relation to your interactions with us and our Services and we endeavour to be transparent in our dealings with you as to what information we will collect and how we will use it. This Privacy Policy together with our general terms and conditions set out the basis on which any personal data we collect from and about you or about clients that you provide to us, or that we collect as a by-product of providing our services to you, will be processed by us. We provide services as summons servers, tracing agents, record searchers and investigators (licensed with the PSA) (our **Business**).

We collect, use and are responsible for certain personal data about you. The term **personal data** means any information concerning or relating to a living person who is either identified or identifiable. When we do so we are subject to the General Data Protection Regulation (the **GDPR**) and other national data protection and privacy laws (such as, in Ireland, the Data Protection Acts 1988 to 2018 and European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 as may be amended or replaced from time to time) (**Data Protection Laws**).

This Privacy Policy describes how we process personal data we collect from or about you in relation to your use of our websites (including www.aseve.ie) and applications (collectively, the **Sites**) and ordering, enquiring and usage of services of our Business (collectively, our **Services**). We may collect personal data in the course of our Business, including through your use of our Sites, when you contact or request information from us, when you engage our Services or as a result of your relationship with one or more of our staff and agents. In these cases, we are generally the **controller** of such personal data processing. We refer to this information as **Your Data**. Where we process personal data provided for or collected on behalf of our clients in course of providing our Services then we are the **processor** of such personal data processing and our clients are the controllers. We refer to this information as **Client Data**.

We may collect Personal Data from you in the course of our business, including through your use of our Website, when you contact or request information from us, when you engage our Services or as a result of your relationship with one or more of our staff and clients.

Your privacy is of paramount importance to us. This Privacy Policy is designed to:

- (a) with respect to Your Data, protect you by informing you what personal data we collect, how we will use it, with whom we share it, how long we keep it and how to contact us if you have any queries or concerns about our use of Your Data; and
- (b) with respect to Client Data, provide you with information on how our Business collects, uses and protects Client Data, with whom we share it and how long we keep it.

By using or accessing our Services, you agree to the terms of this Privacy Policy. Please read this Privacy Policy, see the Cookies Settings (via the icon in the bottom left of your screen) and any other document we provide to you, such as our general Terms and Conditions, carefully so you understand our practices regarding Your Data and Client Data and how we will treat it. Registering for your account on our Sites, use of your account or our Sites or otherwise accepting the terms of this Privacy Policy indicates that you have reviewed this Privacy Policy and have agreed to be bound by it. If you do not agree to these terms you must leave our Sites immediately.

1. WHO WE ARE

1.1 We are Aserve Investigators Limited trading as Aserve (a company incorporated and registered in Ireland under number: 533813 whose registered office is at Unit 15, Floor 3, Kilmartin N6 Centre, Dublin Road, Athlone, Co. Westmeath, N37 TH93, Ireland, registered with the Private Security Authority under P.I. No. 06002). You can contact us by email at info@aserve.ie. Please find our contact details for contacting us through this Site or via phone or post here: www.aserve.ie/contact-us

1.2 Aserve has appointed a Data Protection Officer to monitor Aserve's compliance with its data protection obligations. You can contact our Data Protection Officer by email at the following address: info@aserve.ie.

2. OUR LEGAL BASES AND PURPOSES FOR PROCESSING YOUR DATA

2.1 We may use or disclose Your Data on any one or more of the following legal bases: (i) to perform a contract with you; (ii) for our legitimate business purposes in providing our Services to you (in which case, our legitimate interests will not override your fundamental privacy rights); (iii) to meet legal obligations to which we are subject; and/or (iv) in limited circumstances, where you have given us your express consent.

2.2 Please note that we may process Your Data for more than one legal basis, depending on the specific purpose(s) for which we are using Your Data. We have set out below the most commonly applicable legal basis for the purposes and processing activities below. Please contact us via www.aserve.ie or on the other contact details set out in section 1 "Who We Are" above.

2.3 For individuals who visit and interact with our Sites, we process data:

- (a) to respond to your query when you contact us through one of our Sites including through our [Contact Us](#) form;
- (b) to sign you up for our marketing or events alerts when you request be signed up through our Sites;
- (c) to administer, improve and protect our Sites and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data); and/or
- (d) to register you for an account on the Sites.

We do not collect or compile data for dissemination or sale to outside parties for marketing purposes, or host mailings on behalf of third parties.

The legal basis for this processing is our legitimate interest in the administration and operation of our Business and Sites as well as our legitimate interest in marketing and promoting our Services.

2.4 For our potential clients, we process data:

- (a) in order to market our Services;
- (b) to provide you with information about services we offer through our Business that are similar to any you may have already requested from us or enquired about; and/or
- (c) to provide quotations for fees.

The legal basis for the processing of this data is that it is necessary for the purpose of the legitimate interests of our Business in promoting our Services.

2.5 For our clients, we process data:

- (a) to allow us to provide you with the Services you request from us;
- (b) in order to liaise with you about the matters on which you seek our Services;
- (c) to comply with legal obligations to which we may be subject (such as accounting, audit or tax compliance, complying with a Court order, anti-money laundering regulations or financial sanctions);
- (d) to notify you of any changes to our Services;
- (e) to provide you with information about Services we offer that are similar to those you have already requested of us or enquired about; and/or
- (f) to monitor and improve the quality of our Services.

The legal basis for the processing of this data is processing necessary for the purposes of the legitimate interests pursued by our Business in representing our clients, for compliance with a legal obligation (where required to do so). We may also seek and rely upon your consent to certain marketing activities.

2.6 For candidates interested in positions with or providing services to our Business, we process data:

- (a) to recruit new employees or agents; and/or
- (b) to ascertain your suitability for a specific role.

The legal basis for this processing is processing necessary for the purpose of the legitimate interests of our firm in recruiting new staff. We may also provide further privacy/data protection information in our job advertisements on how we process applicant data. Please review this information carefully if relevant to you.

2.7 We may also process Your Data to enforce our legal rights or defend or undertake legal proceedings. Depending on the circumstances, the legal basis for processing of this data will be to fulfil our legal and regulatory obligations; or in other cases, for our legitimate interests (to protect our business, interests and rights).

3. PERSONAL DATA WE PROCESS

3.1 With respect to Your Data and Client Data, we may collect and process this information we obtain directly from you or from other sources:-

3.1.1 Information we obtain directly from you:

This is information about you and/or Client Data that you give us by corresponding with us by phone, email, through our Sites or otherwise. It includes the information you supply us with when you seek employment with us, or you engage us to provide our Services, or when you wish to be provided with relevant information to you and/ or your business. For persons who view and interact with our Sites, we process Your Data (i) to respond to requests for searches or other Services; (ii) to respond to your query when sent through our [Contact Us](#) form; and or (iii) to sign you up to a newsletter or updates when you ask to do so, through our Sites should we in the

future introduce that facility in our Sites. The information you give us may include, but is not limited to, first names, surnames, address, e-mail address, occupation, phone number, or other identification documents, etc. When you visit our Sites, we may collect your internet protocol (IP) address and login data, browser or client application information, language preference, operating system and application version, device type and ID, and device model and manufacturer, and other technology on the devices you use to access the Sites or other information through cookies (please find more information on our use of cookies in section 4 below).

3.1.2 Information we collect from other sources:

In the provision of our Services, we obtain Client Data from several sources such as those tasked with registers maintained in the public interest (e.g. the Companies Registration Office, Register of Beneficial Ownership and the Property Registration Authority), government and regulatory authorities, publicly available websites, directories, social media and subscribed services, and other service providers, local enquiries on the ground, etc. For more information on information we collect and how we do so in the provision of our Services, please find further detail on the [Services](#) pages of this Site. Our clients are not obliged to provide us with either Your Data or Client Data. However, if you do not, we might not be able to carry out the services you have requested of us. Such information can include prefixes and suffixes, names, former names, personal and business addresses, directorship and shareholder information, dates of birth, civil status, and any other information contained in public records and registries.

4. COOKIES

4.1 What is a cookie?

4.1.1 A cookie is a small text file that is placed on your electronic device (e.g. computer, smartphone or other electronic device) when you use our website. Cookies contain information that is transferred to your device's hard drive. Our Website uses cookies to distinguish you from other users of this website. This helps us to provide you with a better experience when you browse this website and also allows us to improve this website.

4.1.2 Cookies also help us to improve our service to you and to deliver many of the functions that make your browser experience more user-friendly. For example, on revisiting the website our computer server will recognise the cookie, giving us information about your last visit. They help us to improve the website and to deliver a better and more personalised service. They enable us:

- (a) to make our Sites operational;
- (b) to optimise performance of our Sites;
- (c) to store to estimate our audience size and usage pattern; and
- (d) to store information about your preferences, and so allow us to customise the website according to your individual interests and make your usage of the website more enjoyable.

4.2 Our use of cookies

First party cookies:

You can find a list of first party cookies we use and the purposes for which we use them below:

Cookie: aserve.ie

Purpose: To enhance the user experience, such as remembering the user's preferences.

Duration: 2 Days

Third party cookies

Please note that a number of third parties may also use cookies. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies help us to improve our Service and to deliver many of the functions that make your browser experience more user-friendly.

You can find a list of third party cookies we use and the purposes for which we use them below:

Cookie: google.com

Purpose: These cookies are used by Google to collect information about the users who visit this site, such as browsing behaviour, device information, location and interests. This information is used by Google to provide analytics, such as tracking the performance of the website.

Duration: 2 years

4.3 **Third party access to cookies**

The cookies we use will only be accessed by us and those third parties named in the table above for the purposes referred to in this Cookies Notice. Those cookies will not be accessed by any other third party.

4.4 **Consent to cookies, how to turn off all cookies and consequences of doing so**

4.4.1 We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with the Service on your request, or this website.

4.4.2 You can withdraw any consent to the use of cookies or manage any other cookie preferences by clicking on the Cookie Settings icon/cookie button at the bottom left of your screen. You may need to refresh your page for your settings to take effect.

4.4.3 If you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. However, if you use your browser settings to block all cookies (including essential cookies), aware that you may lose some of the functionality of our website.

4.4.4 The “Help” menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

4.4.5 For further information about cookies and how to disable them please go to the [guidance on cookies](#) published by the UK Information Commissioner’s Office or www.allaboutcookies.org.

5. **WHO WE SHARE YOUR DATA AND CLIENT DATA WITH**

5.1 Where appropriate we may share Your Data and Client Data with agents, contractors, or partners of Aserve in connection with our Services that these individuals or entities perform for or with Aserve. These include but are not limited to providers of document management services, IT support services, accounting support services, and third party experts solely for the purposes we have listed above in the section 2 “Our Legal Bases and Purposes for Processing Your Data” above.

5.2 We restrict access to Your Data and Client Data to employees, contractors, and agents who need such access in order to operate, develop, or improve our Services. These individuals are bound

by confidentiality obligations and may be subject to discipline, including termination, civil litigation and/or criminal prosecution, if they fail to meet these obligations.

- 5.3 We may share Your Data with our professional advisors such as accountants, auditors, lawyers, bankers, insurers, and other outside professional advisors.
- 5.4 In respect of Your Data, we may share such data with anyone you authorise us to give Your Data to.
- 5.5 Where we reasonably believe that you are or may be in breach of any applicable laws we may disclose Your Data or Client Data to relevant third parties, such as law enforcement agencies. We would only do so in circumstances where such disclosure is permitted or required under applicable laws, including Data Protection Laws.
- 5.6 If our Business is acquired or merged with another company, Your Data and Client Data may be transferred to the new owners so that we may continue to sell products and Services to you. If we become involved in a merger, acquisition, or any form of sale of some of all of its assets, Your Data will not be transferred to any third party unless there are adequate safeguards in place with the recipient in respect of the security of Your Data.

6. RETENTION OF YOUR DATA AND CLIENT DATA

- 6.1 We adhere to strict review and retention criteria that are set down in our Data Retention & Erasure Policy in place to meet these obligations. Your Data will be kept and stored for such period of time as is necessary taking into account the purpose for which it was collected in the first instance. This may include retaining Your Data as necessary to administer our Business relationship and/or any account you have registered on our Sites; comply with our legal obligations; resolve disputes; enforce our agreements; support our Business operations; and/or continue to develop and improve our Services.
- 6.2 Where we retain Your Data for improvement and development of our Services, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyse personal characteristics about you.
- 6.3 We will retain Client Data only for so long as authorised by and upon the documented instructions of our clients and in accordance with our Data Retention & Erasure Policy, or otherwise required by or permitted by law (e.g. to comply with requirements of the Private Security Authority or other statutory requirements), and in compliance with Data Protection Laws.

7. SECURITY OF YOUR DATA AND CLIENT DATA

- 7.1 We take our security responsibilities towards all personal data, including Your Data and Client Data, seriously, employing appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of Your Data and Client Data, including staff training and awareness. In particular, we consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Your Data and Client Data transmitted, stored or otherwise processed. We review our personal data security measures and procedures regularly.
- 7.2 We restrict access to Your Data and Client Data to employees, agents and contractors on a need-to-know basis in order to operate, develop or improve the Services. We might store information in different places. Physical files are stored in our office and our archives. Electronic files are stored on our secure servers.

- 7.3 We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, our Sites may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies (See further in section 11 “Links to Third Party Websites” below). We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.
- 7.4 Unfortunately, the transmission of information by means of the internet, including through e-mail, is not completely secure. Although we will do our best to protect Your Data and Client Data, we cannot guarantee the security of your data transmitted to or from us by means of email and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. To the extent permitted by law, we are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that our Services may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of Your Data and Client Data arising from such risks.

8. INTERNATIONAL DATA TRANSFERS

- 8.1 Your Data and Client Data may be transferred, stored and accessed within the European Economic Area (EEA) or transferred to, stored in, and accessed from countries outside the EEA for the purposes of us providing our Services. It may also be processed by staff operating outside the EEA who work for us or any of our suppliers.
- 8.2 Unless otherwise permitted by Data Protection Laws, we can and will only transfer Your Data and Client Data to a territory outside the EEA where an adequate or equivalent degree of protection of your rights is assured. We will take all steps reasonably necessary to ensure that Your Data and Client Data are treated securely. Such safeguards in place with regard to the transfer of Your Data to third countries shall include (but shall not be limited to):
- (a) the country has been deemed to provide an adequate level of protection for personal data by the European Commission (known as an adequacy decision) further to Article 45 of the GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is [available here](#). For example, we rely on adequacy decisions for transfers to the following countries: United Kingdom, Canada and New Zealand.
 - (b) we have entered into appropriate contracts with third parties incorporating standard contractual clauses approved by the European Commission under Article 46(2) of the GDPR together with any supplementary measures required appropriate to any risks in the transfer. For further details, see [European Commission: Standard contractual clauses for data transfers between EU and non-EU countries](#). For example, we rely on standard contractual clauses for transfers to the following countries: United States, Canada (where an adequacy decision above does not apply), Australia, South Africa and other states in the continent of Africa, and any other country/nation outside the EEA that is not subject to an adequacy decision.
 - (c) there are appropriate safeguards that comply with Chapter V of the GDPR in place, together with enforceable rights and effective legal remedies for you.

(d) a specific exception applies that comply with Article 49 of the GDPR or other applicable Data Protection Laws.

8.3 We transfer Client Data to jurisdictions where instructed to do by our clients which may rely on an adequacy decision, appropriate contracts or safeguards, or a specific exception (e.g. where we transfer Client Data that is necessary for the establishment, exercise or defence of legal claims) as set out above.

8.4 Please contact us (see section 1 “Who We Are” above) if you want further information on the specific mechanism used by us when transferring Your Data outside the EEA.

9. YOUR RIGHTS RELATING TO YOUR DATA

9.1 As a data subject, you have the following rights under Data Protection Laws and, where we act as controller of Your Data, we have a duty to comply with such rights in respect of Your Data. These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of Your Data, please contact us (see section 1 “Who We Are” above). We will respond to any rights that you exercise within one month of receiving your request, unless the request is particularly complex, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

9.2 If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Right in relation to Your Data	Further Information
Right of Access	<p>You have the right to request a copy of Your Data. Requests for Your Data must be made to us (see section 1 “Who We Are” above) specifying what personal data you need access to, and a copy of such request may be kept by us for our legitimate purposes in managing the Services. To help us find the information easily, please give us as much information as possible about the type of information you would like to see. If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.</p> <p>We are also entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so); or (ii) we are entitled to do so pursuant to Data Protection Laws.</p> <p>For security reasons, we will take reasonable steps to confirm your identity before providing you with any personal data we may hold about you.</p>
Right of Rectification	<p>You have the right to request that we amend any inaccurate or incomplete personal data that we have about you. If you would like to</p>

	<p>do this, please (i) email or write to us (see section 1 “Who We Are” above); (ii) let us have enough information to identify you (e.g. name, registration details); and (iii) let us know the information that is incorrect and what it should be replaced with.</p> <p>If we are required to update Your Data, we will inform recipients to whom that personal data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.</p> <p>It is your responsibility that all of the personal data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see contact details in section “Who We Are” above).</p>
Right to Object	You have the right to ask us to stop using Your Data, and we will comply unless there is a legal basis for us to continue using it, which we will explain to you.
Right to Erasure	<p>You can ask us to erase Your Data (i) where we do not need Your Data in order to process it for the purposes set out in this Privacy Policy; (ii) if you had given us consent to process Your Data, you withdraw that consent and we cannot otherwise legally process Your Data; (iii) you object to our processing and we do not have any legal basis for continuing to process Your Data; (iv) Your Data has been processed unlawfully or have not been erased when it should have been; or (v) the personal data have to be erased to comply with law.</p> <p>We may continue to process Your Data in certain circumstances in accordance with Data Protection Laws. Where you have requested the erasure of Your Data, we will inform recipients to whom that personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.</p>
Right to Restriction of Processing	<p>You may request that we stop processing Your Data temporarily if (i) you do not think that Your Data is accurate (but we may start processing again once we have checked and confirmed that it is accurate); (ii) the processing is unlawful but you do not want us to erase Your Data; (iii) we no longer need the personal data for our processing; or (iv) you have objected to processing because you believe that your interests should override the basis upon which we process Your Data.</p> <p>If you exercise your right to restrict us from processing Your Data, we will continue to process the personal data if: (i) you consent to such processing; (ii) the processing is necessary for the exercise or defence of legal claims; (iii) the processing is necessary for the protection of the rights of other individuals or legal persons; or (iv) the processing is necessary for public interest reasons.</p>
Right to Data Portability	You may ask for an electronic copy of Your Data that you have provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to personal data that you have provided to us – it does not extend to data generated by us. In addition,

	the right to data portability also only applies where (i) the processing is based on your consent or for the performance of a contract; and (ii) the processing is carried out by automated means.
Right to be informed	You have the right to clear, transparent and easily understandable information about your rights and about how we use Your Data. We use this Privacy Policy to inform you of your rights.
Right to withdraw Consent	Where processing is based on your consent, you have the right to withdraw your consent at any time with future effect by contacting us. However, if you do withdraw your consent we may not be able to continue to provide the Service we offer to you.
Right to ask us to stop contacting you with direct marketing	<p>We have a legitimate interest to send you electronic communications in connection with the Services and related matters (which may include but shall not be limited to newsletters, announcement of new features or Services, etc. and which may also appear on social media platforms such as Facebook, LinkedIn, Twitter or Instagram). We may also ask you for your consent to send you direct marketing from time to time.</p> <p>You may be able to select your preferences with respect to direct marketing when registering an account on our Sites. We may also ask you different questions for different services, including competitions. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.</p> <p>You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:</p> <ul style="list-style-type: none"> • click on ‘unsubscribe’ in the marketing email received from us; or • send an email to info@aserve.ie with “Unsubscribe” in the subject of the email. <p>We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have “Unsubscribed”. Unsubscribing from direct marketing does not unsubscribe you from electronic communications in respect of the administration of business relationship with you.</p>
Right to Complain to the Data Protection Commission	If you do not think that we have processed Your Data in accordance with this Privacy Policy, please contact us in the first instance (see section 1 “Who We Are” above). If you are not satisfied, you can complain to the Data Protection Commission or exercise any of your other rights pursuant to Data Protection Laws. Information about how to do this is available on the Data Protection Commission website at www.dataprotection.ie .

10. PERSONAL DATA BREACH REPORTING

- 10.1 We will notify serious Personal Data Breaches in respect of Your Data to the Data Protection Commission without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned

justification for the delay. However, it is not necessary to notify the Data Protection Commission where the Personal Data Breach is unlikely to result in a risk to the rights and freedoms of natural persons. In this section, a **Personal Data Breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

- 10.2 We will keep a record of any Personal Data Breaches, including their effects and the remedial action taken, and will notify you of any Personal Data Breach affecting Your Data (which poses a high risk to you) or Client Data (which poses a high risk to your clients) when we are required to do so under Data Protection Laws. We are not required to notify you of a Personal Data Breach where (i) we have implemented appropriate technical and organisational measures that render Your Data or Client Data unintelligible to anyone not authorised to access it, such as encryption; (ii) we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or (iii) it would involve disproportionate effort, in which case we may make a public communication instead.

11. AUTOMATED DECISION-MAKING AND PROFILING

We do not use any personal data for automated decision-making or profiling.

12. LINKS TO THIRD PARTY WEBSITES

- 12.1 This Privacy Policy applies to websites and services that are owned and operated by us. We do not exercise control over the sites/applications that may be linked from the Services. You may see 'social buttons' during your use of the Sites, including but not limited to Twitter, Facebook, LinkedIn and Instagram which enable you to share or bookmark certain web pages. These websites and social platforms have their own cookies and privacy practices, which are controlled by them. These other sites/applications may place their own cookies or other files on your computer, collect data or solicit personal information from you. You acknowledge that the Services may enable or assist you to access the Sites' content of, correspond with, and purchase goods and services from, third parties via third-party websites and that you do so solely at your own risk.
- 12.2 We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of Your Data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via the Services. We encourage you to carefully familiarize yourself with the terms of use and privacy policies applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

13. CHANGES TO THIS PRIVACY POLICY

- 13.1 We may update this Privacy Policy from time to time and at our sole discretion. We will publish the date of the most recent updated version on our Sites and at the top of this Privacy Policy, as appropriate.
- 13.2 If you do not agree to these changes, please do not continue to use the Services to submit Your Data. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on our Sites or by sending you a notification in relation to this.