

## **PRIVACY POLICY ARKADIN**

Respect is one of our values, respecting your privacy comes naturally to us.

Arkadin and its affiliates (collectively, "Arkadin", "we", "us") recognize and respect the importance of protecting your privacy. To that end, we have adopted the principles set forth in this privacy policy (the "Policy") to communicate our information gathering and dissemination practices to our visitors (hereunder referred as to "you" or "Visitor(s)"). Please read this Policy carefully. By using the Arkadin web site (the "Site") and / or the Arkadin Services (as defined below), you signify your assent to this Policy. If you do not agree to this Policy, please do not use Arkadin Internet site nor the Arkadin services.

Details of such Arkadin can be found here: <https://www.arkadin.co.uk/about-us/our-offices>

### **SCOPE**

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This Policy is intended to inform you of the steps we take to protect the Personal Information (as defined below) that you choose to provide us with. Because you have decided to transmit us your Personal Information, we recommend that you carefully review this Policy. This Policy applies to Arkadin Internet site (hereunder referred as to "Site"), to all the services offered by Arkadin through the Site (the "Arkadin Services") and to all Personal Information such as but not limited to your e-mail address, first name, last name, zip code, professional, mobile and / or home telephone number, identification number, location data, online identifier that we directly or indirectly collect or otherwise receive from you, whether manually or digitally processed (the "Personal Information"). Our Client (as defined below) may invite you to use this Site and / or the Arkadin Services in order to participate in conferencing services initiated by them. This Policy does not apply to information our Clients collect or receive from you and we cannot guarantee or enforce the privacy policies of our Clients. "Client" is defined as any entity using the Arkadin Services, including but not limited to (i) the Client as signatory to a contract with Arkadin for Service provided, or (ii) any current or former person designated by the Client, such as any current or former employee, agent, subcontractor, or consultant of the Client, who leads, manages or attends a conference irrespective of whether such person has a relationship with the Client. The Site, Arkadin Services and other products and services available herein are not developed for or directed at children. The Site is not designed to attract children under the age of eighteen. We do not knowingly solicit or collect Personal Information from any person that is under the age of eighteen. Visitors under eighteen years of age are not eligible to do business with us. The Site may contain banner advertisements and hyperlinks that can take you to web sites run by third parties. Please be aware that we are not responsible for the privacy practices of other web sites even if we try to link only to sites that share our respect for privacy. For this reason, please review the privacy policies of these web sites before disclosing any Personal Information to or through them.

## **INFORMATION DISCLOSURE**

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The Personal Information that you submit to Arkadin remains your property. We do not share, sell or rent Personal Information to unrelated third parties nor transfer Personal Information within Arkadin without proper purpose, and it will remain confidential. Subject to obtaining your consent as may be required by law, and - regarding points (a) and (b) below - by ticking the opt-in box- until you choose to opt-out, when you submit your email address at the Site and/or registering for the Arkadin Services, you agree to receive marketing emails from us, , you grant Arkadin the right to use that Personal Information: (a) for marketing and/or marketing survey purposes; (b) in order to enable Arkadin to send you promotions about Arkadin Services; (c) for updates of any information that we may deem appropriate for you to receive in connection with your continued use of the Site and Arkadin Services; (d) to reach you, when necessary, regarding issues concerning your use of the Site and Arkadin Services; (e) to provide you with information that you request and give you an interactive experience; and (f) to handle requests for data access or correction and resolve complaints in relation to the use of your Personal Information. We may disclose Personal Information to third parties with whom we have contractual relationships in order to assist us in Arkadin Services when necessary for the provision of such services such as invoicing and transmission of e-mail communications. If Arkadin discloses Personal Information to third parties acting as our agents, such third parties will be required to comply with our Policy. We may also disclose Personal Information if required to do so by law or in the good faith belief that such action is necessary: (a) to the extent required by law; (b) to the extent required to respond to judicial process or a good faith belief that such action is necessary under law or to comply with legal process served on us; (c) to protect the security and integrity of the Site and of Arkadin Services; (d) to protect our rights and property and the rights and property of others; (e) to take precautions against liability; (f) to respond to claims that submitted information violates the rights or interests of third parties; (g) to correct technical problems and malfunctions in how the Site operates or processes Visitors' information; (h) in connection with a merger, consolidation or sale of all or substantially all of the stock or assets of one or more of our businesses; (i) to provide to our Clients pursuant to your request in furtherance of ensuring that you do not receive further communications from our Clients or from us; or (j) pursuant to our Clients' specific direction in connection with a service we are providing on behalf of our Clients.

## **SECURITY**

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Although we take appropriate measures to safeguard your Personal Information against unauthorized or accidental access or disclosure, we cannot assure you that Personal Information that we collect will never be disclosed in a manner that is inconsistent with this Policy. The Site is created and controlled by us and we periodically review our compliance to this Policy and our security practices to identify security threats or opportunities for improvement. Arkadin may collect certain information from you such as Internet Protocol addresses and other data related to your use of the Site (the "Site Data"). This information is logged to help diagnose technical problems and to administer the Site in order to constantly improve the quality of the Arkadin Services. We may also track and analyze non-identifying and aggregate use and volume of statistical information from our Clients and other Site Visitors and provide third parties with such

information. Only employees or consultants who need the Site Data and Personal Information to perform a specific job function are granted access to it. All such employees or consultants are contractually bound to adhere to our security policy, which they must acknowledge that they have read and understood. The practices for handling Site Data and Personal Information are disseminated to all of our employees and consultants. When we ask you to enter Personal Information, and when such information is stored and/or transmitted, that information is encrypted and is protected with SSL encryption software. If you have any question about the security related to the Site, please contact us our data officer at [privacy@arkadin.com](mailto:privacy@arkadin.com)

## **PERSONAL INFORMATION COLLECTION**

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It is solely your choice whether or not you provide Personal Information. However, should you choose not to provide the Personal Information, we may be unable to process an order, fulfill a service or display certain content on the Site. When you visit the Site, we send a cookie and/or "gif" file (a "cookie") to assign an anonymous, unique identifier to your Internet browser. Cookies are files that web browsers place on a computer's hard drive and are used to tell us whether Visitors have visited the Site previously. Stand-alone cookies do not identify a Visitor personally. They merely recognize that Visitor's browser. Unless a Visitor chooses to identify himself to Arkadin by logging in, he remains anonymous to Arkadin. Cookies come in two types: "session" and "persistent based". Session cookies exist only during an online session and disappear from the Visitor's computer when the Visitor closes its browser software or turns off his computer. Persistent cookies remain on a Visitor's computer after he has closed his browser or turned off his computer. Persistent cookies include such information as a unique identifier for a browser. Arkadin uses session cookies containing encrypted information to allow the system to uniquely identify you while you are using the Site. This information allows Arkadin to process your online transactions and requests. Session cookies help us make sure you are who you say you are after you log in and are required in order to use the Site. You can disable your web browser's ability to accept cookies at any time. If you do so, you will be able to browse the Site but will not be able to successfully use all of the Services. We treat any information that may be contained in cookies with the same level of protection as Personal Information you provide us with. To disable and reject certain cookies, please adjust security settings in your web browser options. For more information about our use of cookies, please refer to our [Cookie Policy](#)

## **ACCESS TO PERSONAL INFORMATION**

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You are responsible for maintaining the confidentiality of your login name, password and/or pin code and for restricting access to your computer or account. You are responsible for (a) the use of your Personal Information or access to the account by any individual with whom you (i) share your login name, password and/or pin code, or (ii) authorize to use your account, and/or (b) any unauthorized use or access that results in whole or in part from your failure to protect the confidentiality of your login name, password and/or pin code. Arkadin will assign to you confidential account access details such as an access number and a pin code. It is your responsibility to keep this information confidential.

A Visitor seeking access to his or her Personal Information that we collected directly from that Visitor may contact us. An individual seeking access to his or her Personal Information that we received from a Client must contact the Client directly.

Any Visitor is entitled to notify a breach of privacy or rectify, or delete his or her Personal Information and to object, upon legitimate grounds, to the processing of his/her Personal Information or make any claim of complaint about privacy breach by contacting our data officer at: [privacy@arkadin.com](mailto:privacy@arkadin.com)

Arkadin will acknowledge receipt of your request or complaint, and try to investigate and respond to you within 30 days.

### **OPT-OUT / UNSUBSCRIBE**

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To stop receiving future communications from Arkadin, please use the opt-out form mentioned in the last communication you received. To opt-out of having your Personal Information shared with third-parties related to Arkadin, please use the opt-out form. Arkadin may maintain separate e-mail lists for different purposes: to end your e-mail subscription from a particular list, follow the instructions at the end of each e-mail message to unsubscribe from the particular list. To unsubscribe from all Arkadin e-mail lists, please use the opt-out form.

### **MODIFICATIONS TO PRIVACY POLICY**

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We reserve the right to make modifications to this Policy at any time. Any material change to this Policy will be prominently posted online and accessible via this Site 30 days prior to taking effect. Your continued use of the Site will constitute an affirmative acknowledgement and acceptance by you of the terms of the prevailing Policy, provided that your right to object and terminate your usage of the Arkadin Services in accordance with our contract terms shall remain unaffected by notifying us under the contact address below. If you have any questions about this Policy or the practices of Arkadin, please feel free to contact our data officer at [privacy@arkadin.com](mailto:privacy@arkadin.com).