

## PRIVACY POLICY

This is the Adelphi Digital group of companies' Privacy Policy ("**Policy**").

The Company is committed to ensuring the security of all Personal Information provided to it, as well as transparency and accuracy regarding the collection, process and management of such Personal Information, regardless of whether such Personal Information belongs to persons with whom we have business relations, or visitors/users of the Company's website.

This Policy sets out in detail how your Personal Information is collected, processed and managed by the Company, what your rights are in relation to your Personal Information, as well as how you can contact the Company in the event you have queries or concerns.

For the purposes of this Policy, "**Personal Information**" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. The Company is considered a "**data controller**" in respect of such Personal Information it collects, uses or manages.

### Company Details

References to "**the Company**" in this Policy mean:

- UK – Adelphi Digital Consulting Group Ltd, whose registered address is at Origin Two, 106 High Street, Crawley, West Sussex, England, RH10 1BF
- Singapore – Adelphi Digital Consulting Group Pte Ltd, whose registered address is at 41 Duxton Hill, Level 2, Singapore 089619
- Australia – Adelphi Digital Consulting Group Pty Ltd, whose registered address is at Unit 119, Level 1, Mode 3 Building, 24 Lonsdale Street, Braddon ACT 2612
- Thailand – Adelphi Digital Consulting Group Ltd, whose registered address is at Draft Board Coworking Space, 26/-47 12A Floor, Orakarn Building, 46 Chit Lom Alley, Khwaeng Lumpini, Krung Thep Maha Nakhon 10330, Thailand

**Whose information is collected**

The Company may collect Personal Information from a host of varying individuals, including:

- i. representatives of companies/associations with whom the Company has business relations, including potential relations or otherwise;
- ii. business partners;
- iii. external contractors;
- iv. job applicants; and
- v. general visitors/users of the Company's websites.

**What information is collected and why such information is collected**

The Company collects, processes and retains Personal Information from you where it is deemed relevant for the Company's purposes. Details of the Personal Information collected and the purposes are described below.

For business purposes and general provision of information:

The Company may collect Personal Information from you for business use. Such information may include your name, photographic identification, gender, job designation, home address, email address, contact details, business details, and correspondence with you (email or otherwise).

Such Personal Information is collected for purposes that are related to business, including for the negotiation, conclusion and performance of contracts and general management of business relations.

At times, you may also provide Personal Information, including name, email address and contact number, to the Company on a voluntary basis (via the contact form on the Company's website). Under these circumstances, the Company shall use such Personal Information volunteered by you for correspondence purposes as well as to provide you with the information or services sought by you.

From website:

When you visit or use the Company's website, the Company will collect specific forms of Personal Information that are sent by your browser. Such Personal Information includes your IP address, browser type, language, time zone and access times. The Company also uses 'cookies', which collect information about you and your visit to the Company's website, including the manner in which you arrived at the Company's website, your usage of the Company's website and how navigation is carried out by you. Such information is anonymous and is logged and used in the aggregate for statistical purposes.

The Company uses this Personal Information for general administration of the Company's website and internal operations, including data analysis, research and troubleshooting. 'Cookies' are used to facilitate your visits to the Company's website and to track the overall usage of the Company's website in order to provide an enhanced experience to people who revisit the Company's website.

#### Job applications

If you are looking to apply for a job at the Company, the Company shall request certain Personal Information from you, including your name, your email address, your LinkedIn profile and your *Curriculum Vitae* (inclusive of all information within it).

Personal Information provided via this channel shall be processed and used by the Company solely for recruitment purposes. In the event that your job application is unsuccessful, the Company may opt to retain your Personal Information for a period of up to **twelve (12) months** for the purpose of considering you for other roles within the Company. If you do not want the Company to retain such Personal Information, you may write in to the Company to request erasure of this information.

#### Access to third party websites

Other third party websites made accessible through the Company's website via hyperlinks or otherwise are not owned nor operated by the Company and such websites are NOT subject to this Policy. The Company has no control over such websites and all visitors/users shall exercise their own judgment when accessing such websites.

### **Legal basis for processing such information**

The Company is required to set out the lawful basis for processing your Personal Information. The Company's basis for processing your data includes one or more of the following:

- i. your consent to having such data collected and processed for the purposes outlined earlier;
- ii. necessity for the performance of the Company's contract with you;
- iii. necessity for the Company's compliance with its legal obligations; and/or
- iv. necessity for the Company's legitimate business interests.

**Who has access to such information and/or who such is shared with**

Employees of the Company may have access to your Personal Information for business, legal or administrative purposes. Under such circumstances, employees of the Company are restricted from using the Personal Information for purposes outside the limits of this Policy.

The Company may disclose your Personal Information to third parties including the authorities, the Company's advisors, parties engaged for the purpose of providing services requested by you. Such Personal Information may also be disclosed by the Company in order to protect its legal rights or to comply with a legal obligation.

The Company may share your Personal Information with entities within the group. All companies within the group are required to maintain the confidentiality of your Personal Information and are restricted from using the Personal Information for purposes outside the limits of this Policy.

**How long such information is kept for**

The Company shall keep your Personal Information for no longer than is required for regulatory/legal or the Company's business purposes. Different retention periods may be put in place, depending on the type of Personal Information recorded. Regardless, you may request that the Company erase your Personal Information and the Company shall accede to your request, provided that such Personal Information is not necessary for the purposes outlined in this Policy.

**What are your rights**

You have the following rights in relation to your Personal Information:

- Right to access
- Right to rectification
- Right to erasure
- Right to limitation of processing
- Right to objection of processing

If you wish to enforce any of your rights set out above, please put in a request to the Company's Point of Contact stated below. The Company shall accede to your request, if possible, unless the Company requires such information in order to comply with its legal obligations or if the Company has good reason for not acceding to the request.

**Updates to Policy**

The Company will amend this Policy from time to time, and the updated versions will be posted on the Company's website and date stamped so that you are aware of when the Policy was last updated.

**Point of Contact**

If at any point in time, you have any queries or concerns regarding how your Personal Information has been or is being processed, please contact the Company via email at [hr@adelphi.digital](mailto:hr@adelphi.digital).

(last updated: 01/8/2018)