

# Privacy Policy

PRODEC respects your privacy and seeks to protect your personal data. The following information describes how we gather and use data which we may collect about you while you are navigating the pages of this website as well as details on how we use the information you provide to us.

PRODEC prides itself in respecting the data protection fundamental principles, that include:

- Lawfulness, fairness and transparency
- Purpose Limitation
- Storage Limitation
- Accountability

It is important to us that you are fully aware of what exactly happens to the personal information you choose to share with us throughout the duration of our relationship.

## 1) What sort of data is collected?

### 1.1) Data collected through the PRODEC website.

In general, as a user of our website, you may visit the site without telling us who you are or revealing any information about yourself. You may however choose to provide us with personal information when you send an e-mail to us via the 'contact' link on our website. We shall store the data that you provide us with in any such e-mail and further process it as may be necessary for us to respond to and administer any request that you may so make.

This information may include any information that you have provided to us voluntarily such as your name, company, business department, address or any other contact points including your contact number, email address or fax number when you contacted us by email or phone.

We use Google Analytics to better your 'surfing' experience on our website. You may access Google's privacy policy [here](#) as well as its Terms of Use [here](#) (Section 7) and [here](#).

We do not collect any of your sensitive data, nor do we pass on the information that we do collect to any unauthorized third parties.

Our website may use a technology called 'cookies'. A 'cookie' is a piece of software, which may be sent to your computer. Cookies enable us to collect information about how our website and services are being used and to manage them more efficiently.

The information so gathered through cookies may include:

- The date and time when you access our website;

- The Website pages that you view and any download that you may make through such pages;
- Whether or not such viewing or download is successful;
- The internet address of the website or the domain name of the computer from which you access our website;
- The operating system of the machine running your web browser and the type and version of your Web browser.

You can stop your browser exchanging cookies with web servers at any time by changing the settings in your web browser.

## 1.2) Data collected through any one of our subsidiary or affiliate companies.

We retain the right to share the data you provide to us within our Group of companies.

## 2) Your rights and how to use them

As a data subject you are awarded a number of rights under the European Union Regulation 2016/679 (General Data Protection Regulation (GDPR)), including:

- The right to be informed - we have an obligation to provide you with the full picture of how your personal data will be used and processed;
- The right to access any of the data that we hold on you;
- The right to change or amend data that is inaccurate or incomplete;
- The right to withdraw your consent allowing us to process your data (where such processing is permitted through your consent) or object to us processing it any further;
- The right to request that your data be deleted (also known as your right to be forgotten);
- The right to block or suppress processing of your personal data under certain circumstances;
- The right to data portability which allows you to obtain and reuse your personal data for your own purposes across different services under certain circumstances.

So, how do you go about exercising your rights? Should you wish to exercise any of your rights as a data subject or make a complaint in this regard, you are kindly asked to make a request in writing to PRODEC at the address indicated on the homepage of the website and to sign same as the data subject to whom the particular data relates, or send us an email on [info@prodecglobal.com](mailto:info@prodecglobal.com)

As a data subject, you also have the right to lodge a complaint with the relevant supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement, if you feel that PRODEC has infringed your data protection rights under the Regulation.

In addition to the above, you also have the right, as a data subject, to seek judicial recourse in those instances where you feel your data protection rights have been infringed as a result of the processing of your personal data that is not in compliance with the Regulation.

### 3) Provision of personal data to third parties

We do not pass on the details collected from you as a visitor to any third party, unless you give us your consent to do so, or in the instances indicated below. We also do not transfer your personal information to any third parties for marketing purposes.

As a member of the European Union, Luxembourg abides by the principle of personal data sharing between Member States (ie states within the EU/EEA) in order to award you more protection as a citizen as well as to offer you an overall better service experience in line with Community Law.

You will be aware however that data sent via the Internet may be transmitted across international borders even where the sender and receiver of information are located in the same country. Consequently, data relating to you may be transmitted via a country that does not form part of the EU/EEA (known as a third state). The GDPR founds itself on the protection of your rights as a European citizen and necessitates that even third states maintain an adequate level of protection when your data leaves the EU's ambit. However, as of yet, the EU/EEA has not concluded the list of countries that satisfy this requirement in terms of Article 45 of the GDPR. Where there exists no adequacy decision by the Commission, the law states that transfers of data may still be effected so long as there exist the same safeguards offered to data subjects to award them the same level of protection. In light of this, certain contractual provisions have been preapproved by the Commission that offer effective legal remedies to you in relation to the processing of your personal data by any third parties we contract with, that operate outside of the EU/EEA.

Without prejudice to anything contained in this Privacy Policy, we reserve the right to disclose personal data relating to you to any third party, if such disclosures are necessary inter alia for the following purposes:

- For the purpose of preventing, detecting or suppressing fraud;
- To protect and defend our rights and property or that of users of our Website;
- To protect against abuse, misuse or unauthorised use of our Website
- To protect the personal safety or property of users of our Website (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else, we shall disclose any information we may have about you in our possession so as to assist any type of investigation into your actions);
- For any purpose that may be necessary for the performance of any agreement you may have entered into with us; or
- As may be allowed or required by or under any law or court order.

### 4) Retention of personal data

No personal data that we process will be kept longer than necessary for the purposes for which it is processed or if a retention period is required by law.

### 5) Privacy compliance

Our Privacy Policy is compliant with European Union Regulation 2016/679 (General Data Protection Regulation (GDPR))

## 6) Security

- Unauthorised access;
- Improper use or disclosure;
- Unauthorised modification;
- Unlawful destruction or accidental loss.

To this end we have implemented security policies, rules and technical measures to protect the personal data that we have under our control. All our employees and data processors, who have access to and are associated with the processing of personal data, are further obliged to respect the confidentiality of our visitors' personal data.

By its very nature however the Internet is not a secure medium and data sent via this medium can potentially be subject to unauthorised acts by third parties. We cannot guarantee the privacy or confidentiality of any information passing over our Website. We shall accept no responsibility or liability whatsoever for the security of your data while in transit through the Internet.

## 7) Third party websites

Our Website may from time to time contain links to both local and international third-party websites after obtaining permission from them. Any such links are not an endorsement by us of any information in such websites or products and/or services offered through the same. We shall not accept any responsibility whatsoever for the content, use, availability, privacy practices or the content of any such websites. Please note that upon entering such other websites, you become subject to the Privacy Policy of such other sites.

No third party is permitted to link any other Website to our Website without obtaining our prior written consent.

## 8) E-mail communications

We may intercept some mail and e-mail addressed to individuals in PRODEC. The reasons for this are related to security of PRODEC, its staff and others, for detection and prevention of crime and to identify correct recipients, or to make sure mail is dealt with during staff absence. In the case of e-mails, we may reject, delay or remove content from e-mails which have a nature, content or attachments which may disrupt our systems or because they may pose security issues such as viruses. We may also filter out e-mails which contain certain content on the basis that such content is offensive or the e-mail is unwanted or spam. In certain circumstances this may unfortunately result in "innocent" e-mails being affected but we do try to reduce such occurrences.

Most e-mail messages sent from PRODEC have been automatically scanned for viruses and as such should be free from any virus, malicious code, script or other executable attachment. However, the accuracy of scanning products is not guaranteed. We cannot be held responsible

for loss of or damage to data or any other damages, resulting from actions out of our control, howsoever incurred.

## 9) Privacy policy modification

PRODEC reserves the right to modify this Privacy Policy at any time. You will be informed of any substantive modifications and changes to our Privacy Policy and it is recommended that you read through and understand such changes.

If you have any questions regarding our Privacy Notice please contact us on [info@prodecglobal.com](mailto:info@prodecglobal.com)