

Website Privacy Notice

This website is operated and provided by Encyclis Limited ("**Encyclis**", "**we**", "**us**", "**our**") having its registered office at Floor 4, Lynton House, 7-12 Tavistock Square, London WC1H 9LT. In this notice ("**Privacy Notice**"), references to "**you**" and "**your**" are references to a user of our website.

INTRODUCTION

This Privacy Notice explains what personal data Encyclis collects from you, or that you provide to us, what we will use it for and with whom we share that information. The notice also sets out your rights and who you can contact for more information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For information on how we process the personal data of visitors to Encyclis sites, contractors working at or with Encyclis, and other individuals with whom we may have a business relationship, please see our Third Party Privacy Notice.

Encyclis is a data controller of your personal data, which means we decide how to process your personal data and have certain responsibilities in relation to your personal data Personal data means any information that can be directly or indirectly related to you.

In this Privacy Notice the term "**Data Protection Legislation**" means all applicable legislation relating to privacy or data protection in force from time to time, including the EU General Data Protection Regulation ("**GDPR**") and the GDPR as it forms part of the domestic law of the United Kingdom.

CHANGES TO THIS PRIVACY NOTICE

Any changes we make to this Privacy Notice in the future will be posted on this page of the Encyclis website. We strongly encourage users to check our Privacy Notice each time they use the Encyclis website. However, any material changes to this Privacy Notice will be notified through an appropriate method.

HOW WE COLLECT YOUR PERSONAL DATA

Information you give to us. This is personal data that you give us by corresponding with us, for example when you contact us through one of the methods set out on our website. It also includes personal data you provide if you report a problem with our website.

Information we automatically collect about you.

- Each time you use the Encyclis website, we will automatically collect certain personal data e.g. data related to your device such as your IP address used to connect your device to the Internet.
- We also may automatically collect certain types of personal data by using cookies, server logs and other similar technologies. There are more details on this in our section on Cookies below.

PERSONAL DATA WE COLLECT

The personal data we process may include:

Communication Data	Personal data that you provide to us when you contact us, for example your name, contact details (home address, email address and telephone number), details of your query and any extra information that you choose to tell or provide to us.
Device and Web Data	Online identifiers (including IP address), device information and information about your visit to our website (including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page).

HOW WE USE YOUR PERSONAL DATA

Data Protection Legislation requires that we process your personal data for purposes that we tell you about and only where we have a lawful basis to do so. The below table sets out our purposes of processing, the lawful basis of processing we rely on, and the personal data processed for that purpose.

Purpose of processing	Lawful basis of processing	Personal Data
To provide you with a safe, smooth, efficient, and customised experience on our website	 Our legitimate interests (to provide, run and administer our website) 	Communication Data, Device and Web Data
To ensure that the content on our website is presented in the most effective manner for you and your device	 Our legitimate interests (to provide you with content relevant to you in the most optimum format) 	Device and Web Data
To provide you with the information and services that you request from us	 Our legitimate interests (to run and administer our business, to provide you with information you have requested or to respond to queries from you) 	Communication Data
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	 Our legitimate interests (to run and administer our website and to evaluate, develop and improve our services) 	Device and Web Data
As part of our efforts to keep our website safe and secure	 Our legitimate interests (to maintain the security of our website) 	Device and Web Data

SHARING YOUR PERSONAL DATA

Encyclis may disclose your personal data to the following categories of third-party recipients where we consider it necessary for the purposes set out in this Privacy Notice:

- Encyclis affiliates.
- Third parties who provide various services to us (such as third parties who support our information technology and analytics and search engine providers that may assist us in the improvement and optimisation of our website) if this is necessary to provide you with our services, respond to your inquiries or for any other related purposes.
- Professional advisors, such as accountants, lawyers or auditors.
- Regulators or other authorities or third parties to comply with the law or assist in a criminal or regulatory investigation, or to protect us (for example, to help prevent fraud or protect or enforce our rights).
- Other parties as part of a corporate transaction, for example if it is proposed that we are to merge with or be acquired by another business in the future.

Encyclis does not undertake marketing activities for third parties, nor does it provide information to third parties for their own marketing purposes.

LINKS TO OTHER SITES

The Encyclis website may contain links to other websites. Encyclis is not responsible for the privacy policies of third party websites to which links are provided. You should check the privacy policies on these sites before providing any personal data. This Privacy Notice relates only to personal data contained on, or gathered via, the Encyclis website.

HOW WE PROTECT YOUR PERSONAL DATA

We take your online security seriously and maintain appropriate physical, organisational and technical measures so as to prevent any loss, misuse, unauthorised access, disclosure or modification of your personal data.

Please note, however, that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your personal data transmitted to us or provided though the Encyclis website.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will only keep your personal data for as long as it is required for the purposes for which it was collected, or as required to comply with applicable law or to defend or enforce our legal rights.

OVERSEAS TRANSFERS OF YOUR PERSONAL DATA

We may transfer your personal data to a recipient based in a country outside of the UK and/or European Economic Area ("**EEA**"). Where we do so, we will ensure that such transfer is in accordance with our obligations under Data Protection Legislation.

For example, this may involve transferring your personal data to a jurisdiction deemed to provide an adequate level of protection of your personal data by the UK and/or European Commission. Other times, the recipient may be in a jurisdiction which has less stringent laws

relating to personal data. In these circumstances, Encyclis will put in place appropriate safeguards to ensure that your personal data remains adequately protected, which may include entering into appropriate standard contractual clauses with the recipient of the data such as the International Data Transfer Agreement or the EU Standard Contractual Clauses alongside, where applicable, the UK Addendum to the EU Standard Contractual Clauses.

If you would like more details about the safeguards we rely on, please contact us using the contact details set out below.

YOUR RIGHTS IN RELATION YO YOUR PERSONAL DATA

You have various rights in relation to the personal data we hold about you. These include:

- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate or incomplete;
- to erasure of your personal data, if you consider that we do not have the right to hold it;
- to restrict processing of your personal data;
- to data portability (moving some of your personal data elsewhere); and
- to object to your personal data being processed in a particular situation, which you may
 exercise if we rely on the fact that the processing is necessary for the purpose of legitimate
 interests pursued by Encyclis in order to carry out that processing.

Where we rely on consent to process your personal data, you also have the right at any time to withdraw any consent you give to our processing of your personal data.

Any request for access to or a copy of your personal data must be in writing and we will respond within any time limits provided for in Data Protection Legislation.

However, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all. We will always tell you if we think we do not have to comply.

RIGHT TO COMPLAIN

You also have the right to complain to the regulator about Encyclis' information rights procedures. In the UK, the relevant regulator is the ICO and their contact details are available here: <u>https://ico.org.uk/make-a-complaint/</u>. In Ireland, the relevant regulator is the Data Protection Commissioner and their contact details are available here: <u>https://www.dataprotection.ie/en/individuals/exercising-your-rights/raising-concern-commission</u>.

COOKIES

Our use of cookies

Encyclis set and access cookies and similar technology on your device to obtain information about how you access and use the Encyclis website. We use the word "cookie" in this Privacy Notice to refer to all technologies that collect information in this way. Our use of cookies helps us to provide you with a good experience and allows us to improve the Encyclis website. Unless you have adjusted your browser settings so that it will refuse cookies, the website will set cookies when you load and navigate them.

What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website during your browsing session or on each subsequent visit, or to another website that recognises that cookie. The cookies we set do lots of different jobs, like help us to improve the Encyclis website and deliver a better and more personalised service, remember your preferences, and generally improve the user experience. You can find more information about cookies at http://www.allaboutcookies.org/.

We may use the following types of cookies on the Encyclis website from time to time:

- Strictly necessary cookies enable core functionality such as security, network management, and accessibility. They also make our website easier to use by accelerating its display through load balancing. You can disable these by changing your browser settings, but this may affect how the website functions. You cannot disable these using our cookies tool.
- Performance cookies these cookies are set to provide enhanced functionality and make our website easier to use, by remembering your preferences, including the preferences you have indicated on our cookies tool.
- Functionality cookies these cookies allow our website to remember the choices a user makes, such as a user name or language preference.
- Targeting or advertising cookies these cookies collect information about a user's browsing habits and are usually placed by advertising networks with the website operator's permission.

Cookies can also be categorised in accordance with how long they are saved on your device: "session cookies" are short-term cookies that are only saved on the device's memory for the duration of a user's visit to the website, whereas "persistent cookies" remain saved in the device's memory for a set period of time, even after the browser session has ended.

Refusing or restricting cookies

You may refuse to accept, or withdraw your previous consent to, cookies via your browser settings which may allow you to refuse the setting of certain cookies. The "Help" or "Internet Settings" functions within your browser should tell you how. For information on how to manage cookies on popular browsers please see the following links:

- <u>Google Chrome</u>
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- <u>Apple Safari</u>

Alternatively, you may wish to visit <u>http://www.allaboutcookies.org/</u> which contains detailed information on cookies and how to delete, restrict or block them on a wide variety of browsers.

For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

To opt out of being tracked by Google Analytics across all websites, you may be able to use the tool provided by Google available at: <u>http://tools.google.com/dlpage/gaoptout</u>.

Please be aware that if you select to refuse or restrict cookies, the full functionality of the Encyclis website may no longer be available.

CONTACTING US

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to our General Counsel. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

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