

Privacy Policy

SPS ANALYSIS & PROMOTION LIMITED (the “**Company**”, “**we**“, “**us**” and “**our**“) respects your privacy. This policy explains our privacy practices for this website (the “**Website**”). It describes the ways your personal information is collected and used.

This policy does not govern the privacy practices related to our products and services other than the Website itself.

INFORMATION WE COLLECT

While completing our online contact form, we will require you to provide us with personal information, such as your name and contact details. You must provide complete, accurate and correct details and you hereby confirm the details you provided are correct. You are not required by law to provide the Company with your personal details. However, if you provide false, incorrect, or outdated information, or only partial information, it may impair our ability to contact you.

When you provide the Company with personal details of another person, you represent and warrant that you received the other person’s explicit written consent to provide these details to the Company and use them according to this Policy.

The Company may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more. Additionally, the Company may collect or use the assistance of third parties to collect and analyze anonymous, statistic or aggregative information related to your use of the Website.

USE OF COLLECTED INFORMATION

We will store the information you provide and the information we collect about your activity on the Website in our database (the “**Database**”). We will use the information, in accordance with this Policy and any applicable law, including for the

- To provide the services on the Website and to enable you to use them;

following purposes:

- To develop and improve our products and services as a whole, and to improve and expand the services and content offered on the Website, to create new services and content which correspond to the requirements and expectations of the users of the Website and our customers and to modify or cancel existing services and content. The information used by the Company for this purpose will be mainly statistical information, and will not identify you personally;
- To contact you occasionally, either by the Company or by anyone on our behalf, including by sending email messages and information related to our services and products;
- To conduct researches and surveys and other similar activities related to products and services development;
- To analyze and provide statistical information to third parties. This information will not identify you personally;
- For the orderly and proper operation and development of the Website;
- To any other purpose specified in this Policy or in the Website's Terms of Use.

TRANSFER OF INFORMATION TO THIRD PARTIES

We may share personal information outlined in this policy, with others, in any of the following instances:

- With our service providers in order to operate, maintain and enhance the Website and facilitate our email communications with you;
- Personal information pertaining to your application for open positions at the Company (including your CV) may be shared with service providers we engage with to evaluate candidates. Their use of such information is strictly limited to this purpose;
- If you abused your rights to use the Website, or violated any applicable law, your information may be shared with authorities or other third parties, if we believe it is necessary or justified;
- With attorneys, courts and relevant third parties, in any case of dispute, or legal proceeding of any kind involving you with respect to the Website;

- If the operation of the Website is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), provided that those entities agree to be bound by the provisions of this policy, with reasonably necessary changes taken into consideration; and
- We may share personal information with our corporate group entities (companies that we control, control us, or are under common control with us, whether directly or indirectly), but their use of such information must comply with the policy.
- In any case other than above, your personal information will be shared with others only if you provide your explicit prior consent.

ACCESSING, UPDATING OR DELETING YOUR PERSONAL INFORMATION AND OBTAINING A COPY OF IT

We respect your privacy rights and therefore you may contact us at any time and request:

- to access, delete, change or update any Personal Information relating to you (for example, if you believe that your personal information is incorrect, you may ask to have it corrected or deleted); or
- that we will cease any further use of your personal information (for example, you may ask that we will stop using or sharing your personal information with third parties) or that we shall remove your personal information (subject to any other legal obligation that may require us to keep the information).

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

If you wish to raise a complaint on how we have handled your personal information, please contact us directly at info@spsanalysis.com

If you are not satisfied with our response or believe we are collecting or processing your Personal

Information not in accordance with the laws, you can complain to the applicable data protection authority.

Cookies and other trackers

We use various types of cookies and other types of web trackers, which help us to administer and operate the Website.

These trackers are used mainly to collect statistical information about your use of the Website.

We use cookies for Website analytics purposes, as explained above.

If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your computer and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information.

Please also bear in mind that disabling cookies may adversely affect your user experience on the Website.

We do not respond to browsers' "Do Not Track" requests.

You may have a right to submit a complaint to the relevant supervisory data protection authority, pursuant to the law.

Changes to this Privacy Policy

From time to time, the Company may change the terms of this policy. You agree to be bound by all changes made in the terms of this policy. Continuing to use the Website will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Website.

Contact Us

You may contact us with any questions or comments at: info@spsanalysis.com

Effective date of the policy: November 2022