

PRIVACY POLICY

INTRODUCTION AND BACKGROUND

This Privacy Policy (“Policy”) sets out how we collect, use, disclose and retain any personal data collected and how individuals (“you”, “your”) may interact with us about it.

Please read this Policy carefully as it also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint.

This Policy applies to the Personal Information of the visitors of our website and service users. It explains why we collect Personal Information, how we will use it, and who we will share it with. For the purposes of data protection law, we are the “data controller” in respect of the Personal Information covered by this Policy.

We collect, use and are responsible for certain Personal Information about you. When we do so, we are subject to and actively comply with the spirit and letter of current Data Protection legislation, including the EU General Data Protection Regulation (2016/679), the Data Protection Act 2018 and abide by the MRS Code of Conduct.

KEY TERMS

It would be helpful to start by explaining some key terms used in this Policy:

We, us, our	Precognitive Acumen Limited (company number 10516873) and its subsidiary PAL Stats Limited (company number 10517147)
Personal information	Any information relating to an identified or identifiable individual

WHAT INFORMATION DO WE COLLECT FROM YOU AND HOW DO WE COLLECT IT?

You are not required to provide Personal Information to us when you visit our website. We will only require you to provide Personal Information to us where it is necessary for us to provide you with a service at your request, such as when you use our contact form.

We may collect and use the following Personal Information about you:

- Your name and contact information, including email address and telephone number and company details;
- Information to enable us to check and verify your identity, e.g. your date of birth.
- Location data, if you choose to give this to us.
- Your billing information, transaction and payment card information
- Your professional interests
- Your professional online presence, e.g. LinkedIn profile
- Information about how you use our website, IT, communication and other systems
- Your responses to surveys and promotions

- Technical connection data such as the visited page of our website, your shortened IP address, date and time of the visitation and the type of terminal used.

This Personal Information is required to provide products and services to you. If you do not provide Personal Information we ask for, it may delay or prevent us from providing products and services to you.

HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect most of this Personal Information directly from you—in person, via the contact form, or otherwise by telephone, or email and/or via our website.

Our website is not intended for minors, and we do not knowingly collect personal information from minors. If persons under the age of 16 transfer personal data to us, it will only be processed if the parent or guardian/legal representative has consented or validated the minor's consent. For this purpose, the contact details of the legal representative must be communicated to us in accordance with Art. 8 para. 2 GDPR.

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

The General Data Protection Regulation (GDPR) and Data Protection Act 2018 require us to explain the valid legal bases we rely on in order to process your Personal Information. As such, we may rely on the following legal bases to process your Personal Information:

- **Consent.** We may process your Personal Information if you have given us permission (i.e. consent) to use your Personal Information for a specific purpose. You can withdraw your consent at any time by sending an email to info@palstats.co.uk.
- **Performance of a Contract.** We may process your Personal Information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your Personal Information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your Personal Information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services.
 - Develop and display personalised and relevant advertising content for our users.
 - Analyse how our Services are used so we can improve them to engage and retain users.
 - Support our marketing activities.
 - Diagnose problems and/or prevent fraudulent activities.
 - Understand how our users use our products and services so we can improve user experience.

- **Legal Obligations.** We may process your Personal Information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your Personal Information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

The table below explains what we use (process) your Personal Information for and our reasons for doing so:

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASONS
To provide products and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract.
Conducting checks to identify our customers and verify their identity. Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations.
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Updating customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations

	For our legitimate interests or those of a third party e.g. making sure that we can keep in touch with our customers about existing orders and new products.
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.

We process your Personal Information for a variety of reasons, depending on how you interact with us, including but not limited to:

- **To deliver and facilitate the delivery of services to the visitors of our website and service users.** We may process your Personal Information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your Personal Information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your Personal Information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To request feedback.** We may process your Personal Information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the Personal Information you send to us for our marketing purposes if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time by sending an email to info@palstats.co.uk
- **To protect our Services.** We may process your Personal Information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process Personal Information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

- **To save or protect an individual's vital interest.** We may process your Personal Information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **To provide market research services.** We may process your Personal Information in accordance with the Market Research Societies Code of Conduct [Code of Conduct | Market Research Society \(mrs.org.uk\)](#).
- **To provide data analysis services.** We may process your Personal Information in accordance to the Market Research Societies Code of Conduct and the Royal Statistical Societies [RSS - Code of conduct](#).

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us via email: info@palstats.co.uk. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

Recordings

We may record and keep track of conversations you have with us including phone calls, letters, emails or any other kinds of communication. We may use these recordings to check your instructions to us, assist with dispute resolution, assess and improve our services and for training purposes.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share Personal Information and always in accordance with the GDPR and any other applicable privacy laws with the following:

- Companies within our group
- Third parties we use to help deliver our products and services to you, e.g. payment service providers;
- Other third parties we use to help us run our business, e.g. marketing agencies or website hosts; and
- Third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, Personal Information anonymised, will be anonymised but this may not always be possible. The recipient of the Personal Information will be bound by confidentiality obligations.

WHERE YOUR PERSONAL INFORMATION IS HELD

Information may be held at our offices and those of our third-party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

As a matter of principle, Personal Information is retained (1) for as long as needed to achieve the purposes as described in this Policy, or (2) if we have another legal basis that requires a longer storage period.

We will delete or anonymise Personal Information (or equivalent) once they are no longer necessary to achieve the purposes for which they have been collected, subject however (i) to any applicable legal or regulatory requirements to store personal data for a longer period, or (ii) to establish, assert, exercise and/or defend actual or potential legal claims, investigations or similar proceedings, including legal holds.

TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your Personal Information outside the European Economic Area (EEA), including:

- With your and our service providers located outside the EEA
- With our consultants located outside of the EEA
- If you are based outside the EEA

These transfers are subject to special rules under European and UK data protection law.

We will only share your Personal Information with countries outside of the EEA which have been assessed by the European Commission as providing an adequate level of protection for Personal Information including, but not limited to, Israel and United States of America as well as organisations which are part of the Privacy Shield Framework.

If you would like further information, please contact us (see 'How to contact us' below).

WHAT ARE YOUR RIGHTS?

We recognise that you have rights as a 'data subject', and that we have an obligation to uphold these. This Policy aims to outline how we maintain these rights. In particular, it outlines:

- How we collect and process your information;
- Why we do this;
- How you can exercise your rights; and
- Who to contact in the event you are unhappy with our performance.

RIGHTS	EXPLANATION
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access: Art. 15 GDPR	You have the right to access your personal data and supplementary information.
Right to rectification: Art. 16 GDPR	If the information we hold about you is inaccurate or incomplete, you can request that we correct this.
Right to erasure:	You can request that we delete or remove personal data where there is no compelling reason for us to continue processing.
Right to restrict processing	You have the right to request that we cease processing your data, if: <ul style="list-style-type: none"> - you consider it inaccurate or incomplete; - you object to processing and we are considering whether we still have a legitimate interest to process it.
Right to data portability: Art. 20 GDPR	<ul style="list-style-type: none"> - Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object: Art. 21 GDPR	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> - direct marketing (including profiling); and - processing for purposes of scientific/historical research and statistics
Rights relating to automated decision-making including profiling	Where we apply automated decision-making, we must: <ul style="list-style-type: none"> - give you information about the processing; - introduce simple ways for you to request human intervention or challenge a decision; - conduct regular checks to make sure that our systems are working as intended. Information related to automated decision-making is contained later in this notice.

Withdrawing your consent: If we are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time. You can withdraw your

consent at any time by contacting us via email: at info@palstats.co.uk. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

DISCLOSURE OF DATA

We may disclose your personal data in the good faith belief that such action is necessary to:

- To comply with a legal obligation.
- To protect and defend our rights or property.
- To prevent or investigate wrongdoing in connection with our service.
- To protect the personal safety of users of our service or the public.
- To protect against legal liability.

SECURITY OF DATA

The security of your data is important to us but remember that no method of transmission over the internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.

CONTACT DETAILS

We recognise that you may have questions about how we process and/or store your data, or may want to change either the data we hold on to you or how we communicate with you in the future.

If you have any questions in respect of this notice, or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access), please get in touch with us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you:

- Precognitive Acumen Limited (company number 10516873) and its subsidiary PAL Stats Limited (company number 10517147) as data controller, can be contacted as follows: Holmbury, 57 Church Green Road, Bletchley, Milton Keynes, MK3 6BY.
- The Data Protection Officer can be contacted via email: info@palstats.co.uk

- Call us on +44 (0)1908 921000.

If you are unhappy that we have responded to your query adequately, or if you have a further complaint, The Information Commissioner's Office can be contacted via <https://ico.org.uk/global/contact-us/> Or by email accessicoinformation@ico.org.uk

Post: Information Governance department. Information Commissioner's Office

Wycliffe House,
Water Lane,
Wilmslow.
Cheshire
SK9 5AF

Helpline number: 0303 123 1113