

Legal, Privacy and Cookie Policy

1. APPLICATION OF THIS POLICY

This Privacy and Cookie Policy applies to personal data controlled and/or processed by Libra Holdings Ltd, 3rd Floor, Par la Ville Place, 14 Par la Ville Road, Hamilton, HM08, Bermuda and its affiliated companies. It includes the following:

- the terms on which we process personal data contributed via the Libra Group Website (“the Site”); and
- information on the cookies used on the Site.

2. PERSONAL DATA

In this Policy, the term “personal data” means any information or combination of information that could be used to identify a living individual.

3. WHAT INFORMATION DO WE COLLECT?

3.1 We collect and process various items of information that you provide to us. These may include:

- personal contact details such as name, address, telephone number and e-mail address;
- your preferences regarding information and events;
- your personal and/or employment history, specialities and experience;
- your social media accounts and related links;
- your connections with other companies within Libra Group.

3.2 We may collect information from other sources in order to ensure that your personal information is accurate and kept up to date. This data may be combined with other information that we collect and use for the purposes described in this Policy.

3.3 We also collect certain types of information automatically, such as your Internet Protocol (IP) address or device identifier, your device’s operating system, browser type, websites visited before or after you visit the Site, pages viewed and activities at the Site.

3.4 This information is collected directly from you, as well as through third parties that you have authorised to provide such information.

4. HOW DO WE USE YOUR PERSONAL DATA?

4.1 We may use your personal data for a variety of purposes, including:

- to provide services that you request;
- to communicate with you;

- to deliver information about us and the work we do, as well as about other members of Libra Group;
- to improve our websites and services;
- and for other legitimate business purposes explained below.

4.2 We may send you marketing emails on topics which we think may be of interest to you. We will always offer you an “opt-out” option, which you may use at any time you wish to cease receiving e-mails or other information from us.

5. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

5.1 We may disclose your information to:

- other companies connected with us; and
- companies we have engaged to provide services on our behalf, under conditions of confidentiality.

5.2 We may also need to disclose your information for the following purposes:

- to comply with the law or respond to lawful requests from government or regulatory agencies;
- where we have reason to believe that disclosure is necessary to protect the safety of our staff, customers or the public.

5.3 Please note that the Site may include links to third-party websites whose privacy practices may differ from our own. If you submit personal information to any of those websites, your information is governed by the privacy policies on those websites. We encourage you to review the privacy policy of any website you visit.

6. HOW LONG DO WE STORE YOUR INFORMATION?

We retain and store your personal data only for as long as we have a legitimate business purpose to do so and in accordance with our data retention policies.

7. YOUR RIGHTS

7.1 You have the following rights in relation to your personal data:

- the right of access to your personal data
- the right of rectification of inaccurate data;
- the right of erasure of your personal data where there is no longer any legitimate basis for processing it (sometimes known as the “right to be forgotten”); and
- (in the circumstances provided for in applicable law) the right to restrict processing, object to processing, and the right to data portability.

7.2 Where the processing of your personal data is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on your consent before its withdrawal.

7.3 If you wish to exercise any of the rights set out above, please contact it@libra.com.

7.4 Under data protection law in certain countries, including the UK and EU Member States, you have the right to lodge complaints about the processing of your personal data with a data protection supervisory authority.

8. COOKIES

8.1 The Site uses “cookies” to ensure the best possible experience for the user. Information provided by the user is stored and packaged into a cookie which will then be sent to your web browser for later use.

What are cookies?

8.2 Cookies are pieces of information stored in your hard drive by the web server of the visited website. The server provides the browser with a cookie to save. They are used to make browsing the internet an easier experience. Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

What are the types of cookies?

8.3 Cookies may be:

- **Session cookies:** These are used while the user is browsing. The cookies will be deleted once the session is over.
- **Third-party cookies:** These cookies are set by the visited site only.
- **Permanent cookies:** These cookies do not get deleted even when the browser is closed. They are used to store the user’s preferences for later use.

For more information about cookies, please see the Interactive Advertising Bureau’s website: <http://www.allaboutcookies.org>.

How do we use cookies?

“Strictly necessary” cookies

8.4 We use some cookies for purposes which are strictly necessary for your use of the Site. These may include, for example, cookies which remember your preferences and settings; which remember information that you may enter online (so that it does not have to be re-entered every time you move to another page); or which keep you logged in to portals that we may offer where you wish this to happen.

Performance cookies

8.5 Where you have permitted the use of performance cookies, we use Google Analytics to analyse the use of the Site. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. These cookies collect information such as your IP address or other identifiers, browser information, and

information about the content you view and interact with to record how you use the Site. The information generated helps us to know how many users we have, which parts of the Site are most popular, what browsers are used (so we can maximize compatibility), the country or region where our users are located, and the demographics and interests of our users. This enables us to better understand who is using the Site and to improve how we present content.

Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>. Google Analytics cookies may retain information for up to two years. For more information about Google Analytics services, please click [here](#).

Managing cookies

8.6 When you first visit the Site you will be presented with a banner which offers you a choice about whether to accept or reject cookies of different types, with the exception of those cookies which are strictly necessary for a particular service. If you wish to amend your choice at any time, click below:

[MANAGE COOKIES](#)

Managing Cookies and Local Storage on Your Device

8.7 If you wish, you can also choose how web browser cookies are handled by your device via your browser settings. Some devices allow you to control this through your device settings. If you choose not to receive cookies at any time, websites may not function properly and certain services will not be provided. Each browser and device is different, so check the settings menu of the browser or device to learn how to change your settings and cookie preferences.

9. CHANGES TO THIS POLICY

We may update this Policy from time to time, so please visit this page periodically and review the Policy for changes.

10. HOW CAN YOU CONTACT US?

You may contact us at the address shown above or alternatively by email to it@libra.com.

DISCLAIMER:

Companies within Libra Group make information available on this site for information purposes only. No liability of any kind is accepted to users of the site.

Whilst we endeavour to ensure that information on the site is correct and updated, we do not warrant its accuracy and completeness. We may make changes to the material on this site at any time without notice (including to these terms and conditions). You should take appropriate steps to verify any information before acting on it.

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