

## **www.eaglealpha.com Website Privacy and Cookies Statement**

### **1. Introduction**

- 1.1 The www.eaglealpha.com website (the "**Website**") is operated by Eagle Alpha Limited ("**we**", "**us**", "**our**", "**Eagle Alpha**"). We respect your right to privacy. This Privacy and Cookies Statement (together with our Website terms and conditions of use ("**Website Terms of Use**"), Disclaimer and, where applicable, our Subscription Agreement ("**Subscription Agreement**") and any other documents referred to sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.2 The following discloses our information gathering and dissemination practices relating to this Website. In order to fully understand your rights, we encourage you to read this Privacy and Cookies Statement and to consult our Website Terms of Use. Each time you use this Website you will be bound by the then current Privacy Statement and you should review this each time you use the Website to satisfy yourself that you are happy with it. Any external links to other websites are clearly identifiable as such and we are not responsible for the content or the privacy statements of these other websites.
- 1.3 For the purpose of the Data Protection Acts 1988 and 2003 (the "**Acts**"), the data controller is Eagle Alpha Limited with its registered office at 19 Elgin Road, Ballsbridge, Dublin 4, Ireland.

### **2. Acceptance Of This Privacy Statement**

By using this Website, you signify acceptance of this Privacy Statement. If you do not agree with or you are not comfortable with any aspect of the Privacy Statement, your only remedy is to discontinue use of the Website. We reserve the right to modify this Privacy Statement at any time. Your continued use of any portion of the Website following notification or posting of such changes will constitute your acceptance of those changes.

### **3. Information We May Collect From You**

We may collect and process the following data about you:

- 3.1 information that you provide to us when using this Website or availing of our services, such as name, company name, fund name, position, address, e-mail address, telephone number, username and password;
- 3.2 information provided at the time of registering to use this Website, signing up for our service, posting material on the Website or requesting further services;
- 3.3 if you contact us for any reason, we may keep a record of that correspondence;
- 3.4 we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- 3.5 details of transactions through the Website to which you are a party, including pre-payments for services; and
- 3.6 details of your visits to the Website including, but not limited to, traffic data, location data and other communication data and the resources, advertisements and linked sites that you access.

#### 4. **Where We Store Your Personal Data**

- 4.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who are engaged by us. Such staff may be engaged in, among other things, the preparation of website content and the provision of sales and customer care services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy and Cookies Statement.
- 4.2 All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password or username which enables you to access certain parts of our Website, you are responsible for keeping this password or username confidential. We ask you not to share this information with anyone.
- 4.3 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We have security in place such as firewalls, backup and other appropriate technical security measures.

#### 5. **Uses Made Of Your Information**

- 5.1 We use information held about you:
- 5.1.1 to ensure that content from our Website is presented in the most effective manner for you and for your computer;
  - 5.1.2 to provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
  - 5.1.3 to carry out our obligations arising from any contracts entered into between you and us; and
  - 5.1.4 to notify you about changes to our Website and/or services.
- 5.2 If you are an existing client, we will only contact you by electronic means (such as email, voicemail or SMS) with information about goods and services similar to those which were the subject of a previous transaction between us.
- 5.3 You may change your preferences at any time by accessing the account settings section of the Website and amending your preferences accordingly.
- 5.4 We do not, without your consent, disclose information about identifiable individuals to third parties, but we may provide anonymised statistical data to them for research and survey purposes. We may also use such information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

#### 6. **Disclosure Of Your Information**

- 6.1 We may disclose your personal information to other members of the Eagle Alpha group of companies and approved contractors or sub-contractors working on our behalf.

- 6.2 We may disclose your personal information to third parties if:
- 6.2.1 we need to work with advisors;
  - 6.2.2 we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
  - 6.2.3 if Eagle Alpha or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users will be one of the transferred assets; and
  - 6.2.4 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use and other agreements; or to protect the rights, property, or safety of Eagle Alpha and its subsidiaries and its group companies, our customers, or others. This may include exchanging information with other companies, such as payment processing companies and organisations for the purposes of fraud protection and credit risk reduction.

## 7. **Security**

We take your online security very seriously and this Website has security measures in place to protect the loss, misuse and alteration of the information under our control. However, as no data transmission over the Internet can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk. We endeavour to use appropriate security measures.

## 8. **Cookies**

### 8.1 What Are Cookies

Cookies are small files that store information on your hard drive or browser that means that our Website can recognize that you have visited our Website before. They make it easier for you to maintain your preferences on the Website, and by seeing how you use the Website, we can tailor the Website around your preferences and measure usability of the Website.

### 8.2 What Do We Use Cookies For

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to record aggregate information, to record session information and/or to assist you in answering questions in connection with our services. This may in some instances only be statistical data about how you browse our Website.

For the same reason, we may obtain information about your Website usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies help us to improve our Website and to deliver a better and more personalised service. They enable us:

- 8.2.1 to estimate usage numbers and patterns;
- 8.2.2 to store information about your preferences, and so allow us to customise our Website according to your individual interests; and

8.2.3 to recognise you when you return to the Website.

### 8.3 Which Cookies Do We Use

The cookies used on our Website are categorized according to the International Chamber of Commerce cookie guidance:

8.3.1 Strictly Necessary;

8.3.2 Performance;

8.3.3 Functionality; and

8.3.4 Targeting.

The cookies used on our Website include:

<b>Name of Cookie</b>	<b>Purpose of Cookie</b>	<b>Reason for use</b>	<b>Privacy Impact</b>
Google Analytics	Google Analytics is a free targeting cookie service offered by Google that generates detailed statistics about the visitors to a website.	We use it to track how users navigate through our website e.g. what pages are performing well/badly, what browsers perform best, the average time a person spends on our website etc.	Low/Medium

We also use authentication and user session management cookies in order to optimise the service we provide to you.

### 8.4 Managing Cookies Usage

You may refuse to accept or you may disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website or unable to avail of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you have any concerns about the cookies used on our Website, please contact us at [support@eaglealpha.com](mailto:support@eaglealpha.com).

## 9. Your Rights

9.1 The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 10. Access to Information

You have the right to request a copy of the information held by us about you. We may charge a fee for this which will not exceed €6.35. You also have the right to access your

data, have changed any inaccuracies in the details we hold about you, the right to object to the use of your data and the right to block any specific uses of your data, by means of a request in writing to Customer Support, Eagle Alpha Limited, 19 Elgin Road, Ballsbridge, Dublin 4, Ireland or by emailing [enquiries@eaglealpha.com](mailto:enquiries@eaglealpha.com).

11. **Contact**

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to Eagle Alpha Limited, 19 Elgin Road, Ballsbridge, Dublin 4, Ireland or [enquiries@eaglealpha.com](mailto:enquiries@eaglealpha.com).