1. Scope

px is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how px Limited, its subsidiaries, affiliates, and other related entities (collectively, "px," "we," or "us" and “our”) collect, store and process personal data about you in relation to:

- Your, or your employer's dealings with us, or an organisation for whom we act as agent; or
- Your use of our website and application; or
- Your use of our data rooms.

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect, store and process about you is adequate, relevant, not excessive, and processed for limited purposes.

2. Collection of Personal Data

This Privacy Notice describes the categories of personal data that we may collect, store and process about you, how we may use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction.

This Privacy Notice also describes your rights regarding the personal data that we hold about you and your rights in respect of our use of your personal data.

2.1 Personal data we collect

Throughout this Privacy Notice any reference to ‘personal data’ should be considered interchangeable with “personal information”.

The personal data is collected directly and exclusively from the users. Among the types of personal data that this application collects, by itself or through third parties, there are:

Cookies, Usage Data and Email Address.

In connection with our business activities and our dealings with you or your employer, we may collect, store, and process the following categories of personal data about you:

Personal Identification Details	For example: full name
Business Contact Details	For example: telephone numbers and email address.
Employment Details	For example: job title, team or department, employer, timesheet information, incidents and reports you have submitted or have been involved in.
Other Special Category Data	Any other special category data you voluntarily provide to us.
IT Information	Information obtained through commonly used tracking technologies, such as cookies and usage monitors, and may include: Internet Protocol (IP) address, areas of the application used, browser type, version and language, device event information,

	crash data and approximate location (as determined through your IP address).
Usage Information	Log data showing the activities of individuals using the application, including date and time of actions executed, the pages and files viewed, website and webpage interactions including searches and other actions you take, language preferences, operating system type and version, system configuration information, date and time stamps associated with your usage, and frequency of visits to the application.
Survey information	Responses to surveys and feedback requests we may use from time to time including for research purposes (although you do not have to respond to them).

2.2 Cookies and Tracking Technologies

A cookie is a text file that is downloaded to your device's hard drive or stored in your web browser's memory when you visit any website, including our application. Cookies help us understand which application you use, and help us improve the performance of our application, for example remembering your preference settings and previous search / filter criteria.

Our application, like many other websites, use several types of cookies:

- first party cookies: those our application placed in your browser
- third part cookies: those other third parties' websites have placed
- session cookies: used by our application during the time you are visiting and using the application
- persistent cookies: placed by our application, which remain stored in your web browser after you have closed the browser, to allow us to remember your preferences and actions from your previous use of our application.

Our use of cookies typically falls into the following categories:

Strictly necessary cookies	Cookies which enable you to move around and use our application. These cookies do not gather information about you or remember where you have been or what actions you have taken.
Analytical cookies	Cookies which collect information about how you and other authorised users use our application, such as which modules have been used and how often they are visited. This information is used to improve the capabilities of the application.
Functionality cookies	Cookies which store and share the choices, filters or searches made in your use of the application, such as individual personal preferences or settings.

We do not use cookies or other tracking technologies for marketing purposes. All cookies and other tracking technologies are used solely for the purpose of improving our services and enabling the application to run effectively.

2.3 Sources of personal data

The personal data that we process will be provided directly by you or gathered by us in the course of your interaction with us via our application.

The personal data that we process may be:

- provided directly by you; or
- gathered by us in the course of your interactions with us including via our application

In certain circumstances, obtained from third parties such as:

- Usage data from commonly used tracking technology,
- your colleagues and those you work with; and
- publicly available sources.

If you provide us with any personal data relating to other individuals, you represent that you have the authority to share such information. Further, you acknowledge that such person's information will be used by us in accordance with this Policy.

2.4 Use of personal data

We may collect, store and use your personal data in the following circumstances:

- where the processing is necessary to comply with a legal obligation,
- for our legitimate interests or the legitimate interests of third parties (such as our customers),
- to protect your vital interests, or
- with your consent if applicable law requires consent.

2.5 Sensitive personal data

We **do not** require you to provide any sensitive data and therefore we typically **do not** collect any sensitive personal data from you, including:

- Race or ethnicity,
- Religious or philosophical beliefs,
- Sex life or sexual orientation,
- Political opinions, views or affiliations,
- Trade union membership,
- Health, genetics, or biometric data,
- Private information about your home, family members, individuals in your private environment, or their households,
- Information about children, our application and services are not intended for individuals under age 18.

In using this application, you agree to not provide any sensitive personal information relating to yourself or other authorised users, including colleagues, contractors or other associated companies.

3. Data Sharing

3.1 Sharing of personal data

We may disclose your personal data to:

- the organisation which engages you;
- members of our group of companies or our or their employees, contractors, professional advisors (including accountants, lawyers and auditors), designated agents, customers, third-party service providers (including data storage or hosting providers);
- other third parties including:
    - where required to do so by law;
    - in the event of the re-organisation, merger, sale, joint venture, assignment, transfer or other disposition of any part of our business or assets;
    - if we, or substantially all of our assets, are acquired by a third party, in which case the personal data held by us will be one of those transferred assets;
    - If we dispose of (or intend to dispose of) any sites or assets we operate for a customer in which case we may disclose your personal data to the prospective replacement operator (if any); and
    - to protect the rights, property, or safety of our business, our customers, suppliers, employees, contractors or visitors. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
    - exceptionally, to any competent regulatory, prosecuting and other governmental agencies or litigation counterparties, in any country or territory;

Unless we are acting on your specific instruction, we exercise due diligence to make sure that there are adequate safeguards for the security, confidentiality and privacy of your personal data, such as restricting access to your personal data to employees who need to know the information for the stated use purposes.

We do not rent or sell your personal data to other companies or individuals.

3.2 Data security

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure, and unlawful or accidental destruction.

In all instances that we share personal data; we take commercially reasonable steps to implement contractural safeguards that:

- Impose obligations on third parties (and their subcontractors) to protect your personal data and key it secure and confidential;
- Prevent third parties (and their subcontractors) from collecting, using, altering or disclosing your personal data for any purpose other tan to perform such functions for us or on our behalf and in accordance with applicable privacy laws and our instructions;
- Prohibit third parties (and their subcontractors) from keeping this information longer than is needed; and
- Require that all third parties report to us within a reasonable period of time any data breach incident to the accidental or unlawful theft, loss, disclosure of, or access to personal data.

3.3 International transfer

Any personal data will be stored on our secure servers at our offices and those of our service providers.

Our processing and use of your personal data in accordance with this Privacy Notice may involve your personal data being transferred to, or processed within, other countries or jurisdictions outside of where you are location. In this event, where we transfer your personal data to other group companies, service providers

or other third parties we will ensure that our arrangements with them are, as necessary, governed by relevant legal mechanisms and safeguards which may include relevant data transfer agreements, designed to ensure that your personal data is protected.

For more information relating to the transfer of data within the European Economic Area or the UK, please refer to §8.

4. Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means.

We specify the retention periods in respect of your personal data in our data retention policy however there may be times where we are required by law or regulatory requirements to retain your personal data for a specified period, in which event your personal data will be retained for such specified period. Similarly, we may need to retain your personal data for longer periods in relation to legal disputes in which event we will retain it for such longer period to the extent required.

Under some circumstances we may anonymise or aggregate your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or without requiring your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal data in accordance with our document retention policy and applicable laws and regulations.

5. Rights of Access, Correction, Erasure, and Objection

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your use of the application. You have the following rights (subject to applicable local laws) in relation to the personal data that we hold about you:

- right to access: to access your personal data, under relevant data protection law;
- right to rectification: to require any inaccurate personal data to be corrected or deleted;
- right to object: to object to our processing of some or all of your personal data (and require them to be deleted) in some other circumstances;
- right to erasure: to require us to delete your personal data in certain circumstances;
- right to restrict: to require us to restrict or prevent the processing of your personal data in certain circumstances (when processing is restricted, we can still store your personal data, but may not use it further);
- right to portability: to obtain from us your personal data, in a structured, commonly used and machine-readable format in certain circumstances. Further, you may have the right to require us to transmit your personal data directly to another person (for instance a new provider) where it is technically feasible to do so;

- right to withdraw consent: where we are processing your personal data based on your consent to such processing, to withdraw your consent under certain circumstances, at any time; and
- right to lodge a complaint: lodge a complaint about our privacy practices to your local supervisory authority in your country.

6. Data protection Representative

We have appointed a Data Protection Representative to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, or (subject to applicable local laws) would like to exercise any of the rights set out in this Privacy Notice, please contact the Data Protection Representative at: dataprotection@pxlimited.com.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will (subject to any legal or regulatory restrictions) inform you of the reasons why.

If you are dissatisfied with our response to any issues that you raise with the Data Protection Representative, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

7. Changes to this Privacy Notice

We reserve the right to amend this Privacy Notice from time to time and any updates to it will be published on our application and/or, as far as technically and legal feasible, sending a notice to users via any contact information available to us. We would encourage you to check back regularly by visiting https://px360.uk/privacy.

If we wish to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose.

8. Transferring your Data outside the UK

8.1 EU/UK Lawful basis for processing

We will only process your personal data where necessary for the purposes described in this Privacy Notice and where we have a lawful basis for such processing. Where our lawful basis for processing is that such processing is necessary to pursue our legitimate interests, we will only process your personal data where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest. We may, for example, process your personal data on the basis of the following legitimate interests:

- to prevent fraud; or
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution; or
- to support internal administration with our affiliated entities; or
- to conduct data analytics analyses to review and better understand application usage.

You will not be subject to decisions based on automated data processing without your prior consent.

In exceptional circumstances we may also be required by law to disclose or otherwise process your personal data.

For certain processing we will rely on your consent. If we rely on your consent, such consent will be clear, freely given, genuine and you will be able to withdraw your consent at any time.

8.2 EU/UK Data Transfers Addition

If you are dealing with us within the European Economic Area or the UK, you should be aware that our processing of your personal data may include transfers to countries outside the European Economic Area and the UK, which have not been determined by the European Commission or the UK to have an adequate level of data protection. In those cases, where we transfer your personal data to other members of the px group, our service providers or partners, we will ensure that our arrangements with them are governed by relevant legal mechanisms and safeguards including data transfer agreements, designed to ensure that your personal data is protected and the transfer is made in compliance with applicable law.

9. Contact us

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact our Data Protection Representative at dataprotection@pxlimited.com.

If you are dissatisfied with our response to any issues that you raise, you have the right to make a complaint with the data protection authority in your jurisdiction.