

## PRIVACY

Prime Advisory Network Ltd is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, Prime Advisory Network Ltd is committed to the appropriate protection and use of personal information (sometimes referred to as "personally identifiable information" or "PII") that has been collected online.

Generally, our intent is to collect only the personal information that is provided voluntarily by online visitors or members of network. Please review this Privacy Statement ("Privacy Statement") to learn more about how we collect, use, share and protect the PII that we have obtained.

### 1. Collection and use of personal information

We obtain personal information about you if you choose to provide it — for example, to contact mailboxes or to register for certain services. In some cases, you may have previously provided your PII to Prime Advisory Network Ltd (if, for example, you are a former employee). By registering and/or submitting personal information to Prime Advisory Network Ltd, you are also agreeing to the use of this information in accordance with this Privacy Statement. Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards.

In some cases where you have registered for certain services we may store your email address temporarily until we receive confirmation of the information you provided via an email (i.e. where we send an email to the email address provided as part of your registration to confirm a subscription request).

Prime Advisory Network Ltd generally collects only the personal information necessary to fulfill your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

*Prime Advisory Network Ltd only collects "sensitive" personal information when the relevant individuals voluntarily provide us with this information or where such information is required or permitted to be collected by law or professional standards. Sensitive information includes personal information regarding a person's race, ethnicity, political beliefs, trade union membership, religious or similar beliefs, physical or mental health, sexual life or criminal record. Please use your discretion when providing sensitive information to Prime Advisory Network Ltd, and under any circumstances, **do not provide sensitive information to Prime Advisory Network Ltd, unless you thereby consent to Prime Advisory Network Ltd's use of that information for its legitimate business purposes and consent to the transfer and storage of such information to and in Prime Advisory Network Ltd databases.** If you have any questions about whether the provision of sensitive information to Prime Advisory Network Ltd is, or may be, necessary or appropriate for particular purposes, please contact Prime Advisory Network Ltd at [info@primeadvisorynetwork.com](mailto:info@primeadvisorynetwork.com).*

## 1.1 Automatic collection of personal information

In some instances, Prime Advisory Network Ltd and its service providers uses cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of Prime Advisory Network Ltd's online presence, and to measure the effectiveness of our marketing activities.

### 1.1.1 IP addresses

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct web site trend and performance analysis.

### 1.1.2 Cookies

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our web sites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web sites' features.

Below is a list of the types of cookies used on our web sites:

<b>Purpose</b>	<b>Description</b>	<b>Type &amp; Expiry</b>
Performance (i.e., User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues	Session

	(e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).	Deleted upon closing the browser
Security (e.g. Asp .NET) Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session Deleted upon closing the browser
Site Preferences	Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session Deleted upon closing the browser
Analytical	We use several third party analytics tools to help us understand how site visitors use our web site. This allows us to improve the quality and content on Prime Advisory Network Ltd.com for our visitors. The aggregated statistical data cover items such as total visits or page views, and referrers to our web sites.	Persistent, but will delete automatically after two years if you no longer visit Prime Advisory Network Ltd.com
Site visitor feedback	<p>We use a third party survey tool to invite a percentage of visitors to provide their feedback. Cookies are used to prevent visitors from being invited multiple times.</p> <p>The first cookie (1) is set if the visitor is not invited to participate in the survey, and is used to ensure visitors are not invited after their first page view.</p> <p>The second cookie (2) is set if the visitor is invited to participate in the survey, and is used to ensure the visitor is not invited again to participate for a period of 90 days.</p>	<p>1 Session Deleted upon closing the browser</p> <p>2 Persistent Deleted automatically after 90 days or presenting survey invite.</p>
Social sharing	We use third party social media widgets or buttons to provide you with additional functionality to share content from our web pages to social media websites and email. Use of these widgets or buttons may place a cookie on your device to make their	Persistent, but will be deleted automatically after two years if you no longer visit Prime Advisory Network Ltd.com

	<p>service easier to use, ensure your interaction is displayed webpages (e.g. the social share count cache is updated) and log information about your activities across the Internet and on our web sites. We encourage you to review each provider's privacy information before using any such service.</p>	
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Other third party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

**BY NAVIGATING ON OUR WEB SITES OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR REGISTERED USERS, YOU AGREE THAT WE CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET ENABLED DEVICE.**

### **1.1.3 Google Analytics**

Prime Advisory Network Ltd uses Google Analytics. More information about how Google Analytics is used by Prime Advisory Network Ltd can be found here: <http://www.google.com/analytics/learn/privacy.html>

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the [Google Analytics Opt-out Browser Add-on](#). The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

### **1.1.4 Web beacons**

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. Prime Advisory Network Ltd only uses web beacons in accordance with applicable laws.

Prime Advisory Network Ltd or its service providers may use web beacons to track the effectiveness of third party web sites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

### **1.1.5 Location-based tools**

Prime Advisory Network Ltd may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

## **1.2 Social media widgets and applications**

Prime Advisory Network Ltd web sites may include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of Prime Advisory Network Ltd web sites (see details on 'Social Sharing' cookies above). Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, Prime Advisory Network Ltd web sites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any Prime Advisory Network Ltd social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

## **1.3 Children**

Prime Advisory Network Ltd understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

## **2. Sharing and transfer of PII**

We do not share personal information with unaffiliated third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards.

In some instances, Prime Advisory Network Ltd may share PII about you with various outside companies or service providers or vendors working on our behalf to help fulfill your requests.

In addition, Prime Advisory Network Ltd may transfer certain PII across geographical borders to other Prime Advisory Network Ltd member firms or outside companies working with us or on our behalf. Prime Advisory Network Ltd may also store PII in a jurisdiction other than where you are based. By providing PII on online, visitors are consenting to this transfer and/or storage of their PII across borders.

Prime Advisory Network Ltd may also disclose PII in connection with the sale, assignment, or other transfer of the business of the site to which the data relates, in order to respond to requests of government or law enforcement agencies or where this is required by applicable laws, court orders, or government regulations. These disclosures may also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat. Prime Advisory Network Ltd does not sell PII to any third parties. Also, Prime Advisory Network Ltd will not transfer the PII you provide to any third parties for their own direct marketing use.

### **3. Choices**

In general, you are not required to submit any PII to Prime Advisory Network Ltd online, but we may require you to provide certain PII in order for you to receive additional information about our services and events. Prime Advisory Network Ltd may also ask for your permission for certain uses of your PII, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our sites may not work properly if you elect to refuse cookies.

### **4. Access**

If you have submitted personal information to Prime Advisory Network Ltd, under most circumstances you have the right to reasonable access to that data to correct any inaccuracies. You can also make a request to update or remove information about you by [info@primeadvisorynetwork.com](mailto:info@primeadvisorynetwork.com) and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

## **5. Data security and integrity**

Prime Advisory Network Ltd has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite Prime Advisory Network Ltd's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information. We also make reasonable efforts to retain personal information only for so long as the information is necessary to comply with an individual's request or until that person asks that the information be deleted.

## **6. Links to other sites**

Please be aware that Prime Advisory Network Ltd web sites may contain links to other sites, including sites maintained by other Prime Advisory Network Ltd member firms that are not governed by this Privacy Statement but by other privacy statements that may differ somewhat. We encourage users to review the privacy policy of each Web site visited before disclosing any personal information.

## **7. Changes to this statement**

Prime Advisory Network Ltd may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date at the top of this page. We encourage you to periodically review this Privacy Statement to be informed about how Prime Advisory Network Ltd is protecting your information.

## **8. Policy questions and enforcement**

Prime Advisory Network Ltd is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personally identifiable information, please contact us at [info@primeadvisorynetwork.com](mailto:info@primeadvisorynetwork.com). You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement.