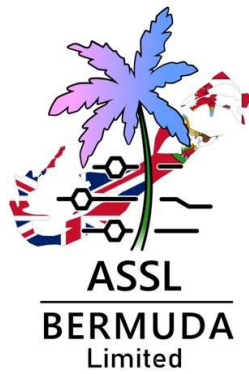




LUMORA

ASSL BERMUDA LIMITED – PRIVACY POLICY



WEBSITE PRIVACY POLICY

We are committed to safeguarding the privacy of our website and dashboard visitors; this policy sets out how we will treat your personal information.

What information do we collect?

We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including, but not limited to, your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation);
- (b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our services;
- (c) information that you provide to us for the purpose of registering with us;
- (d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters;
- (e) any other information that you choose to send to us.

We do not store credit card details nor do we share customer details with any 3rd parties.

Cookies

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website and we will use the persistent cookies to enable our website to recognise you when you visit;

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third-party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites including this one.

Disclosures

We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

(d) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling; and

(e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

Anti Spam Policy

In the context of electronic messaging, spam refers to unsolicited, bulk or indiscriminate messages, typically sent for a commercial purpose.

We have a zero-tolerance spam policy.

Our messaging systems automatically scan all incoming email and other messages, and filter-out messages that appear to be spam.

No message filtering system is 100% accurate, and from time to time legitimate messages will be filtered-out by our systems.

If you believe this has happened to a message you have sent, please advise the message recipient by another means.

You can reduce the risk of a message being caught by the spam filters by sending the message in plain text (i.e. no HTML), removing any attachments, and ensuring that your messages are scanned for malware before dispatch.

In the unlikely event that you receive any message from us or sent using our systems that may be considered to be spam, please contact us using the details below and the matter will be investigated.

We may amend this anti-spam policy at any time by publishing a new version on this website.

International data transfers

All of our servers and application data are located in datacenters in the UK.

Information we collect may be stored, processed, and transferred between any of the countries where we operate, as necessary to use the information in accordance with this privacy policy.

By providing us with your information, you consent to its transfer to countries that may not have data protection laws equivalent to those in the European Economic Area.

Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure password and firewall protected servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will never ask you for your password.

Policy amendments

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee; and
- (b) the supply of appropriate evidence of your identity

We may withhold such personal information to the extent permitted by law.

Third party websites

If website contains links to other websites, we are not responsible for the privacy policies or practices of third-party websites.

Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated.

Contact

If you have any questions about this policy or our treatment of your personal information, please write to us by email to jjbetts@asslbermuda.com.