# **Privacy Policy**

Last updated: June 13 2020

Prospero ("us", "we", or "our") operates Prospero.co.zm (the "Site"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.

## 1. Background

Prospero.co.zm understands and value the privacy of everyone who visits our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

This Privacy Policy applies to any and all data collected by us in relation to your use of our Site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

## 2. This Privacy Policy covers

This Privacy Policy applies only to your use of our Website. It does not extend to any websites that are linked to our Website (whether we provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 3. Data we Collect

Some data will be collected automatically by our Site, other data will only be collected if you voluntarily submit it and consent to us using it to contact us or received new/updates from us. Depending upon your use of our Site, we may collect some or all of the following data:

## From "Receive updates from Prospero" and "Contact us," we collect the following data:

- 1. What data do we collect?
  - Name and Email.
- 2. Why do we want your personal data?
  - To respond to incoming enquiries and to share latest news/updates.
- 3. Can you withdraw your permission?
  - Yes. At any time by sending an email to info@prospero.co.zm.

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. This data is collected automatically.

## 4. How Do We Use Your Data?

All personal data is stored securely in accordance with the EU General Data Protection Regulation (GDPR). We use your data to provide the best possible services to you. This includes:

- Responding to communications from you.
- Sharing latest news/updates with you should you sign up to receive these.
- Analysing your use of Our Website [and gathering feedback] to enable us to continually improve Our Website and your user experience.

We will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and other applicable relevant laws.

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

- You have given consent to the processing of your personal data for one or more specific purposes.
- Processing is necessary for compliance with a legal obligation to which we are subject.

## 5. How and Where Do We Store Your Data?

As such, we retain the general data unless the user specifically requests to delete it. In any event, we will conduct an annual review to ascertain whether we need to keep your data. Your data will be deleted if we no longer need it in accordance with the terms of our Policy.

Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using our Site and submitting information to us. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet.

## 6. Do We Share Your Data?

We may contract with third parties to provide you efficient services. These may include search engine facilities and Google analytics. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take your consent and take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We currently contract with:

Party Name	Purpose	Data Disclosed
	Get statistics	
Google	about the	Google has its own page for that
Analytics	impact and the detail: <u>https://support.google.com/analytics/answer/6318039?hl=en</u>	
	audience	

We may compile statistics about the use of our Site including data on traffic, usage patterns and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties. Data will only be shared and used within the bounds of the law.

In certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of us.

#### 7. Security

We employ appropriate technical and standard security procedures and processes to safeguard the confidentiality of users' personal information. Our employees, agents and associates, do everything in their reasonable control to protect your information.

Any of our employee or agents who may have access to or maintain sensitive personal information, have entered into confidentiality agreements in order to ensure the privacy of such user information prior to sharing that information. Internally, access to all users' information is restricted to those who need access in order to for their job responsibilities and have entered into a confidentiality agreement.

The security of your personal information is important to us, but remember that no method of transmission over the internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

## 9. Right to Withhold and Withdraw Information

You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may withdraw your consent for us to use your personal data at any time by contacting us using the details set out and we will delete your data from our systems. However, you acknowledge this may limit our ability to provide the best possible services to you.

## 10. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by us. Please contact us for more details at info@prospero.co.zm.

### 11. Do we use Cookies?

Our Site does not place and access Cookies on your computer or device. For your security and privacy, we have carefully chosen not to use Cookies to ensure that your privacy is protected and respected at all times.

However, our Site uses analytics services provided by Google Analytics to collect and analyse usage statistics, enabling us to better understand how people use our Site. Our use of them does not pose any risk to your privacy or your safe use of our Site but does enable us to continually improve our Site, making it a better and more useful experience for you.

#### 12. Linked Websites

This Site may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage users to be aware when they leave this Site and to read the privacy statements of each website they visit that collects personal information. While we carefully choose the websites to link to, this Privacy Notice applies solely to information collected on our own Site.

## 13. Contacting Us

If you have any questions about our Site or this Privacy Policy, please contact us by email at <u>info@prospero.co.zm</u>. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## 14. Changes to Our Privacy Policy

This Privacy Policy is effective as of June 13 2020 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time as we deem necessary or as may be required by law. Your continued use of our Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.