

PRIVACY POLICY

1. General terms

1.1. This Privacy Policy (hereinafter - the Policy) covers the procedures for collecting, using, storing and protecting personal data of users of the website [https:// palladiumaward.com/](https://palladiumaward.com/) (hereinafter - the Website), as well as users' rights and the Operator's obligations, and information on the measures taken to protect personal data being processed.

1.2. The Operator endeavours to protect the privacy of the User(s) and to comply with the laws of the European Union, including General Data Protection Regulation (GDPR), the People's Republic of China (PRC), including the PRC Personal Information Protection Law (PIPL), and other applicable laws and regulations.

1.3. This Policy applies to all personal data collected by the Operator from users of the Website (hereinafter referred to as User).

1.4. Before using the Website, please read the following terms and conditions regarding the use of personal information. By using the Website, you acknowledge that you understand and agree to the terms and conditions set out in this Policy.

1.5. If you do not agree to any of the terms of this Policy, you must not use the Website. You may not use the Website if you do not agree to the terms of this Policy.

1.6. If any of the terms of this Policy are unclear to you, you must first contact the Operator for clarification and only then use the Website.

1.7. This Policy applies only to the Website. The Operator does not control and is not responsible for third party websites that the User may access through links available on the Website.

1.8. Use of the Website by persons under the age of 16 is not permitted. By using the Website, you confirm that you are over 16 years of age.

1.9. In any case, the Operator does not collect and does not use personal data of children under the age of 16. If the User provides the Operator with personal data of children under the age of 16, the Operator does not process this data and immediately deletes it.

1.10. The Operator does not process or collect the User's personal data relating to the User's political opinions, religious or philosophical beliefs, or the User's biometric data.

1.11. The Operator has the right to request additional information from the User regarding the User's personal data in the cases provided for by this Policy and/or applicable law, in which case the provision of such information by the User simultaneously implies the User's consent to the processing of such data.

2. Terms and definitions

2.1. The following terms and definitions are used throughout this Policy:

Website - the website located at <https://palladiumaward.com/>;

Personal Data - any information relating directly or indirectly to a specific or identifiable User;

Processing of Personal Data - any action (operation) or set of actions (operations), carried out with or without the use of automated tools, concerning Personal Data, including collection, recording, systematisation, accumulation, storage, clarification (updating, modification), extraction, use, communication (distribution, provision, access), depersonalisation, blocking, deletion, destruction of Personal Data;

Data Controller - competition operator, used in the text as Operator;

Disclosure of Personal Data includes actions aimed at disclosing Personal Data to a specific person or to a specific group of persons.

Dissemination of Personal Data means actions aimed at disclosure of Personal Data to an unlimited number of persons (transfer of Personal Data) or making Personal Data known to an unlimited number of persons, including publication of Personal Data in mass media, posting in information and telecommunication networks or providing access to Personal Data in any other way.

User - a visitor to the Website.

Destruction of Personal Data - actions as a result of which it is impossible to restore the content of Personal Data and/or as a result of which tangible carriers of Personal Data are destroyed.

Cookies - data automatically transmitted to the Operator during the use of the Website by means of software installed on the User's device, including IP address, geographical location, information about the browser and operating system of the User's device, technical characteristics of the equipment and software used by the User, date and time of access to the Website. By accepting the terms of this Policy, the User consents to the use of cookies.

3. Legal basis and purposes of Personal Data Processing

3.1. The legal grounds for processing Personal Data are: Laws of the European Union, including General Data Protection Regulation (GDPR), and the People's Republic of China.

3.2. The Operator processes the User's Personal Data solely for the following purposes:

3.2.1. Registration and identification of the User on the Website, allowing the User to fully use the Website;

3.2.2. Establishing and maintaining communication between the User and the Operator, advising on the contest conducted by the Operator and/or third parties engaged by the Operator to conduct the contest;

3.2.3. Conducting the contest(s) by the Operator, also with the involvement of third parties (legal entities and/or natural persons) for the organisation, data collection, analysis and evaluation of the User's contributions (scientific articles, designs);

3.2.4. Sending the User advertising messages, newsletters about the Operator's products and services and those of its partners, special offers, promotions, prize draws, competitions, surveys to the User's e-mail address, telephone number (User's name) in the messengers "WhatsApp", "Viber", "Telegram", by e-mail, SMS messages, push notifications, as well as providing the User with such information verbally by telephone;

3.2.5. Publication on the website, other advertising and information sources, for purposes unrelated to the identification of the User:

- photographic and/or video material obtained in the course of the Contest(s),
- feedback on the contests organised by the Operator provided by the User;

3.2.6. Improving the quality of the services provided to the User and modernising the Website by processing the User's requests and applications, as well as for the purpose of recording telephone conversations with the Operator (its representatives) in order to improve the quality of the service and to preserve evidence in the event of disputes between the Operator and the User;

3.2.7. Statistical and other research based on anonymous information provided by the User.

3.3. To provide the User with access to the websites of third parties or to the services of website partners in order to receive their offers, updates or services.

3.4. The specific scope of Personal Data processed for the above-mentioned purposes is defined in section 5 of the Policy.

4. Conditions and procedure for giving consent to the processing of Personal Data

4.1. The Operator does not verify the Personal Data provided by the User. In this respect, the Operator assumes that the User provides Personal Data on the Website:

4.1.1. Is a legally competent person. In case of incapacity of the person using the Website, the consent for the processing of personal data is given by the legal representative of the User, who has familiarised himself/herself with the conditions for the processing of personal data set out in this Policy and has accepted them.

4.1.2. The User shall provide reliable information about him/herself or the incapacitated person he/she represents (clause 4.1.1. of the Policy) in the amount necessary for the use of the Website. The User shall keep the personal data provided by him/her up to date.

4.1.3. The User is aware that the information he/she provides about himself/herself on the Website may become available to other Users and may be copied and distributed by such Users in the cases provided for in the Policy and/or as a result of malicious programmes (viruses).

4.2. The User accepts the terms and conditions of the Policy and gives the Operator his informed and freely given consent to the processing and/or communication of his personal data under the conditions established by the Policy and applicable law:

4.2.1. When registering on the Website - for personal data provided by the User to the Operator: by filling in the registration form available on the Internet at the address <https://palladiumaward.com/>. The User shall be deemed to have given his/her consent to the processing and/or distribution of his/her personal data, including the processing and/or distribution and/or use of photo-video images, at the moment of clicking the "Register" button or similar action (marking other information in the registration fields). Compliance with registration by placing a mark in the appropriate field is an expression of explicit, active consent to the processing of personal data. No separate additional consent is given by the User.

4.2.2. In case of any use of the Website - for personal data automatically transmitted to the Operator during the use of the Website by means of software installed on the User's device - the User shall be deemed to have given his/her consent to the processing and/or distribution of his/her personal data at the moment of starting to use the Website.

4.3. By carrying out the actions specified in clause 4.2 of this Policy, the User gives the Operator his consent to the processing and/or disclosure of the relevant Personal Data, the scope of which is specified in section 5 of this Policy, including the collection, recording, systematisation, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision to third parties, access), depersonalisation, blocking, deletion, destruction of Personal Data, with or without the use of automated tools, in accordance with the purposes specified in section 3 of this Policy. The use of cookies is confirmed by the active actions of the User on the site.

4.4. The consent to consent to the processing of personal data provided by the User in accordance with this Policy shall be valid from the date of its provision and for the period necessary to achieve the purposes of processing personal data, or until the User revokes such consent, within a three-year period, unless otherwise provided by applicable law.

4.5. The User's consent to the processing of Personal Data in accordance with this Policy may be revoked by the User at any time. The User may revoke the consent to the processing of Personal Data previously provided to the Operator in one of the following ways: by sending the relevant request in the form of an electronic document to the following e-mail address: david.wong@sprg.com.cn.

5. Personal data processed by the Operator

5.1. The processing of Users' Personal Data is subject to the following conditions:

PURPOSE OF USING THE PERSONAL DATA	VOLUME OF PERSONAL DATA PROCESSED
Registration and Identification on the Website (clause 3.2.1).	<ul style="list-style-type: none"> ● surname and first name; ● e-mail address; ● telephone number; ● date of birth; ● gender.
Establishing and maintaining communication between the User and the Operator in order to inform the User about the procedure and conditions of the relevant contest(s) (clause 3.2.2.).	<ul style="list-style-type: none"> ● surname and first name; ● telephone number; ● e-mail address.
Organising the contest(s) by the Operator, including the involvement of third parties (legal and/or private) to organise, collect data, analyse and evaluate the User's works (scientific articles, developments) (clause 3.2.3.).	<ul style="list-style-type: none"> ● surname and first name; ● telephone number; ● e-mail address; ● passport details; ● permanent registration address; ● bank details (where necessary to fulfil obligations)
Sending of advertising messages; sending of written and oral information (clause 3.2.4).	<ul style="list-style-type: none"> ● surname and first name; ● telephone number; ● e-mail address.
Publication of photographic and video material, received in the course of the provision of services by the Operator; Users' comments on contests organised by the Operator (clause 3.2.5).	<ul style="list-style-type: none"> ● surname and first name; ● image ('royalty-free').
Improvement of the quality of services provided to the Users and modernisation of the Websites (clause 3.2.6).	<ul style="list-style-type: none"> ● cookies
Statistical and other research based on anonymous information (Clause 3.2.7).	<ul style="list-style-type: none"> ● cookies

6. Processing of personal data

6.1. The Operator processes Personal Data based on the following principles:

- Lawfulness, fairness and transparency. Personal data will be processed lawfully, fairly and transparently. All information about the purposes, methods and scope of the processing of personal data will be provided in as accessible and simple a manner as possible;
- The processing of personal data is limited to the fulfilment of specific, predetermined and legitimate purposes;

- Prevent the processing of personal data that is incompatible with the purposes for which it was collected;
- Prevent the merging of databases containing personal data processed for incompatible purposes;
- To process only Personal Data that is relevant to the purposes for which it is processed;
- Ensuring that the content and scope of the Personal Data processed are consistent with the stated purposes of the processing;
- Preventing the processing of Personal Data that is redundant to the stated purposes of its processing;
- Ensuring the accuracy, adequacy and relevance of personal data in relation to the purposes of personal data processing. Inaccurate personal data will be deleted or corrected at the request of the User;
- Destruction or depersonalisation of Personal Data when the purposes for which it was processed have been achieved or when it is no longer necessary to achieve those purposes, receipt of a request from the User to destroy Personal Data, withdrawal of the User's consent to the processing of Personal Data;
- Integrity and confidentiality. When processing Users' data, the Operator shall protect Personal Data from unauthorised or unlawful processing, destruction and damage.

6.2. The Operator processes the User's Personal Data with or without the use of automated means.

6.3. The Operator and other persons who have access to the User's Personal Data shall not disclose or distribute the User's Personal Data to third parties without the User's consent, unless otherwise required by applicable law.

6.4. The User's personal data is stored on electronic media. When processing Personal Data for the purpose of fulfilling obligations under agreements with the User, the Operator may extract Personal Data and store them on tangible media. Such Personal Data shall be stored for the period of time specified by the applicable law.

Personal Data shall be stored (depending on which event occurs first):

- Until the moment of their destruction by the Operator - in case the User withdraws his/her consent to the processing of the Personal Data or requests the destruction of the Personal Data;
- until the expiry of the User's consent (clause 4.5 of the Policy).

6.5. The Operator has the right to transfer Personal Data to third parties in accordance with the requirements of applicable law or with the consent of the subject of Personal Data processing, namely:

- 6.5.1. Partners, such as Website and Application owners, advertising networks and other partners that provide services to the Operator in connection with the placement and display of advertisements on websites, applications, products or services owned or controlled by such partners;
- 6.5.2. Third parties engaged by the Operator to administer the Contest(s), including members of the Contest Jury;
- 6.5.3. Third parties to provide generalised statistics about Users for the purpose of statistical analysis to improve the efficiency of the Website.

6.6. The transfer of personal data to third parties is carried out subject to the following conditions:

- The Third Party guarantees the confidentiality of the Personal Data during its processing and use and undertakes not to disclose the Personal Data of the User to any other person or to distribute the Personal Data of the User without the User's consent;
- The Third Party guarantees compliance with the following measures to ensure the security of Personal Data during their processing: application of data protection measures, detection and recording of unauthorised access to Personal Data and taking measures to restore Personal Data, limitation of access to Personal Data, registration and recording of actions with Personal Data,

control and evaluation of the effectiveness of the measures taken to ensure the security of Personal Data;

- The list of permitted methods of processing Personal Data: collection, recording, systematisation, accumulation, storage, clarification (updating, modification), retrieval, use, communication (distribution, provision, access), depersonalisation, blocking, erasure, destruction, both with and without the use of automated means;

- Third parties are prohibited from communicating and distributing personal data.

6.7. Cross-border transfer of personal data:

6.7.1. General Provisions. The Operator may transfer Users' personal data outside the European Economic Area (EEA) or to countries that do not have the status of "adequate level of data protection" as assessed by the European Union. Such transfer is carried out exclusively for the purposes specified in this Policy (e.g. for holding competitions, interacting with partners or using cloud services).

6.7.2. Protection Mechanisms. To ensure the lawfulness and security of cross-border data transfer, the Operator uses Standard Contractual Clauses (SCC) approved by the European Commission. SCCs are legally binding terms that guarantee:

- Compliance of data processing with the requirements of the GDPR;
- Protection of Users' rights (including the right to access, rectify and delete data);
- Obligation of the data importer to notify the Operator of security breaches;
- Conducting a risk assessment if the legislation of a third country may pose threats to the data.

6.7.3. Parties involved in the transfer. Data may be transferred:

- Partners based in China, the United States and other countries for the purpose of organizing competitions, processing payments or analyzing data;
- Cloud providers whose servers are located outside the EEA.

6.7.4. User Rights. Users have the right to:

- Receive information about the countries to which their data is transferred;
- Request a copy of the SCCs governing a specific transfer;
- Review the additional protection measures taken by the Operator.

6.7.5. GDPR Compliance. All cross-border data transfers are carried out in accordance with Articles 44–49 of the GDPR. In the event of changes in legislation or terms of cooperation with third parties, the Operator undertakes to update the protection mechanisms and notify Users through a new version of the Policy.

7. Measures taken by the Operator to protect personal data

7.1. The Operator shall take the necessary and appropriate legal, organisational and technical measures to protect the information provided by the User from unlawful or accidental access, destruction, modification, blocking, copying, distribution and other unlawful actions by third parties. Such actions include in particular:

- Appoint a person responsible for the processing of Personal Data;
- Implement organisational and technical measures to ensure the security of Personal Data when processed in information systems;
- Monitor incidents of unauthorised access to Personal Data and take steps to prevent similar incidents in the future.

7.2. The User acknowledges that the Operator is required by applicable law to notify regulatory authorities and Users of any breach involving the use of personal information within 72 hours of discovery of such breach.

8. Rights of the User

8.1. The User decides to provide his/her Personal Data and consents to its processing freely, of his/her own free will and in his/her own interest. The User gives his/her consent to the processing of his/her Personal Data in accordance with the procedure set out in clause 4.2 of this Policy.

8.2. The User has the right to obtain from the Operator information about the processing of his/her personal data, including confirmation of the fact of processing of his/her personal data, the place and purpose of processing, the categories of personal data processed, the third parties to whom the data

is disclosed, the period during which the data is processed, as well as to specify the source of the personal data received by the Operator and to request its correction.

8.3. The User may at any time exercise the right to be forgotten (Article 17 of the GDPR), which implies the deletion of the User's personal data upon the User's request, in which case, if the processing of the User's personal data is terminated, the Operator will not be able to provide the User with the opportunity to use the Website. In order to comply with the GDPR, the User has the right to object to processing (Article 21 of the GDPR), the right to restrict processing (Article 18 of the GDPR), the right not to be subject to automated decision-making (Article 22 of the GDPR).

8.4. The User has the right to exercise the right of data portability, i.e. to request the Operator to provide an electronic copy of the personal data to another legal entity free of charge.

8.5. The User has the right to send to the Operator his/her requests and demands (hereinafter referred to as "Request"), including those concerning the use of his/her Personal Data, as well as to withdraw his/her consent to the processing of Personal Data. The Request can be sent in the following ways:

8.5.1. In writing to the address of the Operator (section 10 of the Policy);

8.5.2. In the form of an electronic document (scan, photocopy of the document). The document must be sent from the e-mail address specified by the User during registration on the Website to the e-mail address: david.wong@sprg.com.cn.

9. Updating, correction, deletion and destruction of Personal Data

9.1. The Operator is obliged to inform the User or the User's legal representative, in accordance with the procedure provided by law, about the availability of the User's personal data and, upon the User's or the User's representative's request, to provide the opportunity to acquaint oneself with such personal data within 10 (ten) days from the date of receipt of the User's or the User's representative's request. This period may be extended, but not for more than 5 (five) working days, after sending a reasoned notice to the User stating the reasons for the extension.

9.2. The Operator undertakes to provide the User or his/her legal representative with the opportunity to review, free of charge, the personal data concerning the User.

9.3. Within a period not exceeding 7 (seven) working days from the date on which the User or his/her legal representative provides information confirming that the Personal Data is incomplete, inaccurate or irrelevant, the Operator undertakes to make the necessary changes.

9.4. Within a period of no more than 7 (seven) working days from the date of submission by the User or his/her legal representative of information confirming that such Personal Data was illegally obtained or is not necessary for the stated purpose of processing, the Operator undertakes to destroy such Personal Data. The Operator also undertakes to inform the User or his/her legal representative of the changes made and the measures taken, and to take reasonable measures to inform third parties to whom the User's Personal Data have been disclosed.

9.5. If the fact of inaccuracy of the Personal Data is confirmed, the Operator, on the basis of the information provided by the User or his/her legal representative or an authorised body for the protection of the rights of the data subject or other necessary documents, undertakes to update the Personal Data or to ensure their updating (if the Personal Data are processed by another person acting on behalf of the Operator) within 7 (seven) working days from the date of submission of such information.

9.6. The Operator undertakes to stop the processing of Personal Data or to ensure that the processing of Personal Data is stopped by a person acting on behalf of the Operator:

- In case of discovery of unlawful processing of Personal Data by the Operator or a person acting on behalf of the Operator, within a period not exceeding 3 (three) working days from the date of discovery;
- In case the User revokes his/her consent to the processing of his/her Personal Data;

- When the purpose of the processing of the Personal Data has been achieved.

9.7. The Operator undertakes to destroy the User's Personal Data or ensure its destruction (if the Personal Data is processed by another person acting on behalf of the Operator) within a period not exceeding 30 (thirty) calendar days from the date when the purpose of processing the Personal Data has been achieved.

9.8. If it is not possible to destroy Personal Data within the period specified in clause 9.7 of the Policy, the Operator shall block such Personal Data or ensure its blocking (if the processing of Personal Data is performed by another person acting on behalf of the Operator) and ensure the destruction of Personal Data within the period specified by applicable law.

10. Modification of the Policy

10.1. The Operator reserves the right to make changes to the Policy, avoiding the inclusion of provisions that conflict with applicable legislation. Any changes to the current edition will state the date of the last update. The new edition of the Policy shall be effective from the date of its publication, unless otherwise specified in the revision of the Policy.

10.2. The User is obliged to familiarise himself/herself with the text of the Policy each time he/she uses the Website. Continued use of the Website after the publication of the new version of the Policy implies acceptance by the User of the Policy and its terms. In the event of disagreement with the terms of the Policy, the User shall immediately cease using the Website and its services.

10.3. The User shall send any suggestions and/or questions regarding this Policy to the following e-mail address: david.wong@sprg.com.cn.