
Privacy Policy

Effective Date: 12 March 2022 | Last Updated: 12 March 2026 | Version 3

Introduction

This Privacy Policy ("Policy") is issued by Alethea Ltd., a company incorporated in the Cayman Islands with its registered office at 3rd Floor, Genesis Building, George Town, Grand Cayman, Cayman Islands ("Alethea," "we," "us," or "our"). Alethea is the sole owner and operator of the website located at <https://www.alethea.ky> (the "Site").

This Policy describes how Alethea Ltd. collects, uses, discloses, and protects personal data in accordance with the Cayman Islands Data Protection Act (2021 Revision) and other applicable data protection legislation. By accessing or using the Site, you confirm that you have read and understood this Policy and consent to the practices described herein.

Collection of Personal Information

Alethea may collect and process the following categories of personal data:

- Identity and Contact Data: Name, email address, telephone number, postal address, and other identifying information submitted via the Site.
- Technical and Usage Data: IP address, browser type, device identifier, geolocation, access times, referring website addresses, and usage behaviors.

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- **Communications Data:** Records of your correspondence with us, including any queries or messages submitted via contact forms or email.

We do not knowingly collect data from minors or from unauthorised users.

Legal Basis and Use of Personal Information

We process your personal data on the basis of one or more of the following legal grounds:

- **Performance of a Contract:** Where necessary to provide services or respond to an enquiry.
- **Legitimate Interests:** For website functionality, security monitoring, analytics, and business operations.
- **Consent:** Where you have given explicit permission (e.g. newsletter sign-up).
- **Legal Obligation:** To comply with legal or regulatory obligations.

The data may be used for the following purposes:

- To operate, maintain, and improve the Site;
- To respond to enquiries and provide information about our services;
- To manage legal and regulatory compliance;
- To detect, prevent, or investigate security incidents or misuse;
- To send marketing communications, where legally permitted and with the appropriate opt-out mechanisms.

Disclosure of Personal Information

We may disclose personal data to the following categories of recipients:

- **Authorised Personnel:** Employees, contractors, and advisors bound by confidentiality obligations.
- **Third-Party Service Providers:** Providers of hosting, analytics, communications, and related technical infrastructure, subject to appropriate contractual safeguards.

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- Legal and Regulatory Authorities: Where disclosure is required by law or pursuant to a valid legal process.
- Professional Advisors and Successors: In connection with mergers, acquisitions, or restructuring events involving Alethea.

Alethea does not sell, lease, or license your personal data to third parties for direct marketing purposes.

International Data Transfers and Subprocessors

Personal data may be transferred to and processed by service providers located outside the Cayman Islands. Where such transfers occur, Alethea ensures that appropriate safeguards are implemented in accordance with the Data Protection Act (2021 Revision).

All subprocessors are subject to written agreements imposing obligations equivalent to those set out in this Policy and our internal Data Protection Policy. A list of subprocessors is available upon written request.

Data Security

Alethea implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include access controls, encryption protocols, and regular security assessments.

In accordance with our Master Services Agreement, we will notify affected individuals and regulators, where required, of any personal data breach without undue delay and, in any event, within forty-eight (48) hours of becoming aware of a notifiable breach.

Data Retention

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Personal data will be retained only for as long as is necessary for the purposes for which it was collected, or as required by applicable law, regulation, or internal policy.

Your Rights

Under the Cayman Islands Data Protection Act, you have the following rights:

- Access: To obtain confirmation of whether we hold personal data about you and access a copy.
- Rectification: To request correction of inaccurate or incomplete data.
- Erasure: To request deletion of data, subject to legal exceptions.
- Restriction: To request restriction of processing under certain circumstances.
- Objection: To object to processing based on our legitimate interests.
- Portability: To request transfer of your data to another service provider.

Requests should be submitted to legal@alethea.ky. We reserve the right to verify your identity before processing any request.

Use of Cookies and Tracking Technologies

The Site uses cookies and similar technologies to enhance functionality, personalise content, and perform analytics. You will be notified upon your first visit and can manage cookie preferences through your browser settings.

Website Monitoring and Acceptable Use

We may process personal data such as IP addresses, device IDs, or access logs in connection with:

- Monitoring system performance and security;
- Investigating suspected breaches of our Acceptable Use Policy;
- Enforcing our legal rights and obligations under the [Master Services Agreement](#).

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Updates to this Privacy Policy

We reserve the right to amend this Policy at any time. Material changes will be communicated through the Site. Continued use of the Site after such changes constitutes acceptance of the updated Policy.

Contact Information

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact:

Alethea Ltd.

Attn: Legal Department

10 Market Street, Unit 2122

Grand Cayman, KY1-9006

Cayman Islands

legal@alethea.ky