



## PRIVACY POLICY

This policy sets out:

- (A) The information we collect about you when you visit our website, use our products or services or interact with us.
- (B) How we use, share, store, and secure the information and
- (C) How you may access and control the information.

In this policy, “**VERBA Administrative Consulting & Studies LLC SPC**” or “**we**” refers to **VERBA** of Abu Dhabi (UAE) and “**Platform**” means our website at [www.verbanex.com](http://www.verbanex.com).

In this policy, “**personal information**” refers to any data, information, or combination of data and information provided by you to us or through your use of our products or services related to an identifiable individual.

### 1 What information can we collect about you

1.1 We collect the following types of information about you:

- (a) Account and profile information that you provide when you register for an account or sign up for our products or services, for example, only name, surname, and email address (collectively, “**Account Data**”);
- (b) Information you provide through support channels, for example, when you report a problem to us or interact with our support team, including any contact information, documentation, or screenshots (collectively, “**Support Data**”);
- (c) Communication, marketing, and other preferences that you set when you set up your account or profile or when you participate in a survey or a questionnaire that we send you (collectively, “**Preference Data**”);
- (d) Information about your device or connection, for example, name, surname and email address only and information we collect through cookies and other data collection technologies (please read our Cookies Policy for details) (collectively, “**Technical Data**”); and
- (e) Information about your use of or visit to our Platform, such as SEO and SEM (collectively, “**Usage Data**”).

1.2 We collect the above information when you provide it or use or visit our Platform. We may also receive information about you from other sources, including:

- (a) Our personnel, agents, advisors, consultants, and contractors based in Abu Dhabi in connection with our operations or services, for example, our staff engaged in the fulfilment of your order, processing of your payment, and provision of support services;

1.3 We do not collect sensitive data or data from categories about you. This includes race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, or sexual orientation.

### 2 How we use the information we collect

2.1 We only use your personal information where the law allows us to. We use your personal.

Information only where:

- (a) We need to perform the contract we have entered into (or are about to enter into) with you, including operating our products or services, providing customer support and personalised features, and protecting the safety and security of our Platform;
- (b) It satisfies a legitimate interest that is not overridden by your fundamental rights or data protection interests, for example, for research and development and to protect our legal rights and interests.
- (c) You've given us consent to do so for a specific purpose; for example, we may send you direct marketing materials or publish your information as part of our testimonials or customer stories to promote our products or services with your permission or
- (d) We need to comply with legal or regulatory obligations.

2.2 Suppose you have given us consent to use your personal information for a specific purpose. In that case, you can withdraw your consent anytime by contacting us (please refer to paragraph 8 for contact information). Still, please note this will not affect any use of your information that has already taken place.

2.3 We do not share your personal information with any company outside our group for marketing purposes unless you expressly consent to do so.

2.4 For visitors to or users of our Platform located in the European Union, we have set out our legal bases for processing your information in the Legal Bases Table at the end of this policy.

### **3 How we share information we collect**

3.1 We may share personal information on aggregated or de-identified basis with third parties for research and analysis, profiling, and similar purposes to help us improve our products and services.

3.2 Use any third-party software in connection with our products or services, for example, any third-party software that our Platform integrates with. You might give the third-party software provider access to your account and information. We do not control the policies and procedures of third-party software providers, and this policy does not cover how your data is collected or used by third-party software providers. We encourage you to review the privacy policies of third-party software providers before you use the third-party software.

3.3 Our Platform may contain links to third-party websites over which we have no control. If you follow a link to any of these websites or submit information, their policies will govern your information. We encourage you to review the privacy policies of third-party websites before you submit information to them.

3.4 We may share your information with government and law enforcement officials to comply with applicable laws or regulations, for example, when we respond to claims, legal processes, law enforcement, or national security requests.

3.5 Suppose a third party acquires us due to a merger, acquisition, or business transfer. In that case, your personal information may be disclosed and transferred to a third party in connection with such a transaction. We will notify you if such a transaction occurs and inform you of any choices you may have regarding your information.

### **4 How do we store and secure the information we collect**

4.1 We use data hosting service providers based in Switzerland to host the information we collect.

- 4.2 We have adopted the following measures to protect the security and integrity of your personal information:
- (a) Information is encrypted using TLS/SSL technology;
  - (b) Access to your personal information is restricted to personnel or service providers on a strictly need-to-know basis, who will only process your information on our instructions and who are subject to a duty of confidentiality and
  - (c) Our information collection, storage, and processing practices are reviewed regularly.
- 4.3 We have implemented procedures to deal with any suspected privacy breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 4.4 While we implement safeguards designed to protect your information, please note that no transmission of information on the Internet is entirely secure. We cannot guarantee that your information, during transmission through the Internet, stored on our systems, or processed by us, is safe and secure.
- 4.5 We only retain personal information for as long as it is reasonably necessary to fulfil the purposes we collected, including satisfying any legal, accounting, or reporting requirements. After 1Y, the data will be destroyed. We periodically review the basis and appropriateness of our data retention policy.

## 5 Your rights

- 5.1 You have the right to:
- (a) be informed of what we do with your personal information;
  - (b) request a copy of personal information we hold about you;
  - (c) Require us to correct any inaccuracy or error in any personal information we hold about you;
  - (d) Request erasure of your personal information (note, however, that we may not always be able to comply with your request of erasure for record-keeping purposes, to complete transactions, or to comply with our legal obligations);
  - (e) Object to or restrict the processing by us of your personal information (including for marketing purposes);
  - (f) Request to receive some of your personal information in a structured, commonly used, and machine-readable format, and request that we transfer such information to another party; and
  - (g) Withdraw your consent when we rely on consent to process your personal information (although this will not affect the lawfulness of any processing carried out before you withdraw your consent).
- 5.2 You may opt out of receiving marketing materials from us. No marketing material is available. Please note, however, that even if you opt-out, you will continue receiving notifications or information from us that is necessary for using our products or services.
- 5.3 As a security measure, we may need specific information from you to help us confirm your identity when processing your privacy requests or when you exercise your rights.
- 5.4 Any request under paragraph 5.1 will usually be addressed free of charge. However, we may charge a reasonable administration fee if your request is unfounded, repetitive, or excessive.

5.5 We will respond to all legitimate requests within one (1) month. However, if your request is particularly complex or you have made several requests, it may take us longer than a month.

## 6 Changes to this policy

6.1 We may occasionally amend this policy by posting the updated version on our Platform. By continuing to use our Platform after the changes come into effect, you agree to be bound by the revised policy.

## 7 Policy towards children

7.1 Our products and services are not directed to individuals under 16. We do not knowingly collect personal information from individuals under 16. If we become aware that an individual under 16 has provided us with personal information, we will take steps to delete such information. Contact us if you believe we have mistakenly or unintentionally collected information from an individual under 16.

## 8 Contact us

8.1 Please get in touch with us at [info@verbanex.com](mailto:info@verbanex.com)

8.2 Please contact us if you have any questions or concerns. If your concerns remain unresolved, you can file a complaint with a data protection authority in the country where you live or work or where you feel your rights have been infringed.

Last updated: 1<sup>st</sup> October 2024

## COOKIES POLICY

When you access our Platform, cookies are small text files placed on your device by a web server. We use cookies to identify your access and monitor usage and web traffic on our Platform to customise and improve our products and services.

We use both persistent cookies and session cookies. A persistent cookie stays in your browser and will be read by us when you return to our Site or a partner site that uses our services. Session cookies only last for as long as the session lasts (usually the current visit to a website or a browser session).

We use the following types of cookies:

- (a) Strictly necessary cookies – these are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our website.
- (b) Analytical/performance cookies allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us improve the way our site works, for example, by ensuring that users easily find what they are looking for.

You can block cookies by activating the settings on your browser that allow you to refuse the use of all or some cookies. However, if you do so, you may be unable to access all or parts of our site.

## LEGAL BASES TABLE

| Processing purpose                        | Type of data processed | Legal basis                      |
|---|------------------------|----------------------------------|
| To register you as a user on our Platform | Account Data           | To perform our contract with you |