

PRIVACY POLICY

By using our platform, websites, services, products, software (hereinafter – "Services"), you understand and agree to the collection and use of your information in accordance with this privacy policy. Our privacy policy (hereinafter – "Policy") applies to all visitors, users, clients, and other natural persons (hereinafter – "you" or "your") who access to our Website: <https://syncbox.com/> (hereinafter – "Website") provided we execute the function of data controller with respect to your personal data.

PLEASE READ THIS POLICY ATTENTIVELY.

1. DEFINITIONS

A website is a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at the web address of the Website.

Personal data is information related to an individual that makes it possible or may make it possible, directly or indirectly, to identify an individual, including, but not limited to:

- first name, last name, date of birth, email address, postal address, phone number, financial data;
- device information: IP address; data that can be processed using Internet statistics services (Yandex.Metrica and Google.Analytics and others);
- information about how the User uses and interacts with the Website and Services.

Cookies is a small file that can be placed on a device. The file is saved on the hard disk of a computer, tablet or mobile device and allows you to recognize and remember the User when visiting the site.

2. WHO WE ARE

We are a company Free Zone Establishment "SYNCHRONIZE", License SYNCHRONIZE FZE, License Number L-2103, address: Dubai World Trade Centre, the Offices 3 – One Central, Floor number 03, Smart desk 361-22-TEC, issue date 31/05/2022, expiry date 30/05/2023.

We process personal data of EU data subjects in accordance with the General Data Protection Regulation (hereinafter – "GDPR"), the GDPR-based legislation and the other applicable privacy legislation.

3. WHAT INFORMATION WE COLLECT

(a) What data we collect

When you pay for Services, we get access your personal data:

- first name, last name;
- location;
- email address;
- phone number;

- financial data, including payment card data, which are used to pay for Services.

When you enter into agreement with us, we additionally get access to the following data that they put into our Website with respect to you:

- your feedback with respect to our services

If you consent to get our newsletters, marketing messages we get access the following data about you:

- email address.

(b) What data we collect automatically

We also collect the following data:

- your IP address - a numerical code to identify your device, together with the country, region or city where you are based
- your geolocation data - your IP address can be used to find information about the latitude, longitude, altitude of your device, its direction of travel, your GPS data and data about connection with local Wi-Fi equipment
- information on how you interact with our services
- your browsing history of the content you have visited on our sites, including how you were referred to our sites via other websites
- details of your computer, mobile, TV, tablet or other devices, for example, the unique device ID, unique vendor or advertising ID and browsers used to access our content

(c) What data we receive from cookies

We will also receive information from cookies. We have special policy for cookies and for your convenience we placed it on [web-site](#).

We will not collect special categories of data from you - such as personal data concerning your race, political opinions, religion, health or sexual orientation - unless you have chosen to provide that type of personal data to us.

4. HOW WE USE YOUR INFORMATION

We use your personal data for a variety of business purposes.

Identify you. We will use information to get understanding of a person who entered into agreement with us. We use this information based on your consent.

Contact with you. We will use information to communicate with you; to request feedback regarding our Services; to answer your requests; to provide you with any support and assistance that you may need. We need this information for our legitimate business interests and based on your consent.

Provide you with personalized service. We will use this information to personalize your experience; to make statistical analysis (including with the use of special web instruments, such as Yandex.Metrics, Google.Analytics); to provide technical support to you. We need this information for our legitimate business interests and based on your consent.

Improve our Services. We will use information to improve, test, and monitor the effectiveness of our Website and improve the quality of our services; to develop new services and features that we may propose to you and other clients; to make statistical analysis (including with the use of special web instruments, such as Yandex.Metrics, Google.Analytics); to monitor metrics such as total number of visitors, traffic, and demographic patterns; to protect and improve the security and safety of our Website, you, and other customers, other business partners, and others. We need this information for our legitimate business interests and based on your consent.

Other business reasons. We will use this information to enforce our terms, conditions and policies, to respond to legal requests and prevent harm. We may also use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our marketing efforts. We need this information for our legitimate business interests and based on your consent.

Identify and contact you. We will use information to get understanding of a person who entered into contact with us; to communicate with you; to request feedback regarding the Website, our compliance with our standards and policies; to answer your requests; to provide you with any support and assistance that you may need. We need this information for our legitimate business interests and based on your consent.

Other business reasons. We will use this information to enforce our terms, conditions and policies, to respond to legal requests and prevent harm. We may also use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our marketing efforts. We need this information for our legitimate business interests and based on your consent.

We may use both manual and automated systems, such as machine learning and artificial intelligence, to process your personal data.

Your personal data will not be used for any automated decision-making, including profiling. We do not sell, trade or otherwise transfer user's personal data to any third parties for commercial purposes.

5. DO WE SHARE YOUR INFORMATION WITH ANYONE

There are several situations when we can share your personal data, namely:

Your consent. We may disclose your personal data other persons if you give us the consent to it.

Compliance. We may disclose your personal data where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests and Legal Rights. We may disclose your personal data where we believe it is necessary to enforce, remedy, or apply our terms of service and other agreements; for debt collection; to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the rights, property or safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Third-Party Service Providers. We may share your personal data with third-party vendors, service providers, advertising companies, contractors, agents or other business partners who perform services for us or on our behalf and require access to such information to do that work and only to the extent they need such info to do that work. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity, arrange for joint sales, promotions, and events, enable us to operate our business or to offer you certain products, services or promotions. Some of those third-party service providers may use information about your visits to our websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you. Unless described in this policy, we do not share, sell, rent or trade any of your personal data with third parties for their promotional purposes.

Business Transfers. We may share or transfer your personal data If we are involved with a merger, asset sale, financing, liquidation, bankruptcy, or the acquisition of all or part of our business to another company. In such a case we may need to share information with that company and its advisors.

Affiliates. We may share your information with our affiliates, in which case we will require them to honor this privacy policy. Affiliates include our joint venture partners or other companies that we control or that are under common control with us.

6. HOW, WHERE AND FOR HOW LONG WE STORE PERSONAL DATA

We keep your data to the extent we need to fulfill the purposes outlined in this policy unless the law requires otherwise. We aim to protect your data with the use of a system of organizational and technical security measures.

We does not retain your personal data any longer than it is required for attaining the purposes for which it was collected. Your personal data will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations.

We will also continue keeping your personal data to the extent necessary for either of the following purposes:

- to send you newsletter, marketing and promotional communications emails (you can withdraw your consent to receiving these emails at any time by clicking on the "unsubscribe" link at the bottom of the email)
- for legal and regulatory compliance purposes
- for general Services' improvement purposes

We will permanently delete or de-identify the above information in accordance with our standard data retention practices once all the above purposes cease to be applicable.

We will also permanently delete or de-identify your personal data once you specifically ask us to delete it.

It may happen that we are unable to fully delete or de-identify your information due to technical or other operational reasons (for example where information has been archived and stored in backup systems). Where this is the case, we will take reasonable measures to securely isolate information from any further processing and store it until such time as we are able to delete or de-identify it.

We have taken appropriate technical and organizational measures by using the latest technologies to protect your personal data against loss or unlawful processing but there cannot be 100% guarantee that would safeguard your personal data a from unpermitted disclosure or leakage.

While we will do all reasonable effort to protect your personal data, internet itself is not a secure means of transmission. Your internet connection is at your own risk. This is your responsibility that you access to Services with the use of a secure internet connection. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to e-mails.

7. WHAT RIGHTS YOU HAVE

You have certain rights with respect to your personal data that we collect and process.

You have a variety of rights granted to you pursuant to GDPR. Below we outline the main of them in brief albeit there are others that we did not list. Should you need more detailed guidance, please contact us, our representative or independent GDPR specialist on your rights.

Right of consent withdrawal. You have the right to withdraw from us your consent to process your personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. For more details on this right please read applicable legislation (for EU - article 7 of the GDPR).

Right of access. You have the right to obtain from us confirmation as to whether your personal data are being processed, and, where that is the case, access to that personal data, the information concerning how we process it and some other information. For more details on this right please read applicable legislation (for EU - article 15 of the GDPR).

Right to rectification. You have the right to obtain from us the rectification of inaccurate your personal data. You also have the right to have incomplete personal data completed. For more details on this right please read applicable legislation (for EU - article 16 of the GDPR).

Right to erasure ('right to be forgotten'). You have the right to obtain from us the erasure of your personal data, and we will erase that personal data without undue delay. For more details on this right please read applicable legislation (for EU - article 17 of the GDPR).

Right to restriction of processing. You have the right to ask us to restrict processing your personal data. For more details on this right please read applicable legislation (for EU - article 18 of the GDPR).

Right to object. You have the right to object on grounds relating to your particular situation to processing of your personal data and we will no longer process that personal data unless we are able to demonstrate compelling legitimate grounds for such processing. For more details on this right please read applicable legislation (for EU - article 21 of the GDPR).

Right to data portability. You have the right to receive from us your personal data which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. For more details on this right please read applicable legislation (for EU - article 20 of the GDPR).

Right to lodge a complaint. You have the right to lodge a complaint with a supervisory authority, in particular, in the member EU state of your habitual residence, place of work or of an alleged infringement of the GDPR, about our collection and processing of your personal data. For more details on this right please read applicable legislation (for EU - recital 141-143, article 12, 13, 15, 77 and others of the GDPR).

You can always manage the privacy of your personal data by updating your privacy settings, by managing marketing and promotional communications from us or changing your browser settings to opt-out of cookies in your browser settings (if you however disallow some or all of the cookies, the Services may not work).

You always can withdraw your consent to receiving newsletter, marketing and promotional communications emails by clicking on the "unsubscribe" link at the bottom of the email.

To file a request or act on one of your rights, please contact us at the contact details provided above in section How to Contact Us.

We may need to request specific information from you to help us confirm your identity. If your request is complicated or if you have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Please, keep in mind that there may be exceptions to these rights under the UAE data protection law, with which we must comply, or under the legislation, with which a data processor we

engage must comply. Thus, we may reject the request about execution of your rights where permitted or required by these laws. If we reject your request, we will describe the grounds for it in our response.

We respond to all requests we receive from individuals in the EEA that are using the Services directed to the EEA wishing to exercise their data protection rights in accordance with applicable data protection laws.

8. HOW DO WE COLLECT CHILDREN'S PERSONAL DATA

We do not aim our Services directly at children under the age of 16 and we do not knowingly collect personal data about children under 16. If you are under 16 years old, you should immediately stop using our Services.

9. HOW TO CONTACT US

If you have any questions about how we use your personal data or if you have a concern about how your personal data is used, please email hello@syncbox.com.

Complaints or requests will be responded to within 30 days.

10. WILL WE CHANGE THIS PRIVACY POLICY

We may modify the Policy at any time. If we make material changes to the Policy, we may notify you on our Website or via email. Any changes we make to the Policy are effective on or after the issue date. Each new version replaces any prior version of the Policy.

The court's decision of any provision of this policy as invalid does not entail the invalidity of its other provisions.

Recent changes to this Policy have been made:

- 11/02/2022

A list of all previous changes is available on request.