

PRIVACY POLICY – Intro

- 1. Who we are.** This Privacy Policy sets out how we collect and process your personal data through the use of this application (**App**), including the personal information which you may provide to us through the App when you request a demo. You are deemed to accept the terms of this Privacy Policy on your first use of the App. We may change this Privacy Policy from time to time and such changes shall be effective from the date and time the revised Privacy Policy is posted on the App. PCOT Ventures FZ LLE (**we/us/our**) is a company registered in the UAE, with headquarters located at Creative Tower, PO Box 4422, Fujairah, UAE. We are the data controller and responsible for your personal data.
- 2. What data we collect.** We may collect, use, store and transfer different kinds of personal data about you (**Data**), as listed in Clause 5 below including: first name, family name, email address, business address, name of company, phone numbers, IP addresses, log in data, time zone setting and location, web-browser details, your activities on the App, your preferences in receiving marketing from us and your communication preferences.
- 3. How we collect the data.** We use different methods to collect Data from and about you including through:
 - **Direct interactions.** You may give us your Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes Data you provide when you: (i) visit our App; (ii) enter your details into the App; (iii) subscribe to our publications, such as newsletters; or (iv) request marketing to be sent to you.
 - **Automated technologies or interactions.** As you interact with our App, we will automatically collect Data about your equipment, browsing actions and patterns. We collect this Data by using cookies, server logs and other similar technologies.
- 4. How we use the data.** All Data is processed by us in accordance with applicable data protection legislation. We will only use your Data when the law allows us to. Most commonly, we will use your Data in the following circumstances:
 - Where we need to perform the contract we are about to enter into or have entered into with you, for example where necessary to provide the services requested through this App.
 - As necessary to operate our business, fulfil our legitimate interests (or those of a third party) as described below, or to uphold the data security and integrity of our business and its customers, except where your interests and fundamental rights override those interests.
 - Where we need to comply with a legal obligation or a particular piece of law.
 - Where applicable, with your consent.Generally, we do not rely on consent as a legal basis for processing your Data, although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.
- 5. Our lawful bases for collecting data.** We have set out below, in a table format, a description of all the ways we plan to use your Data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interest is. Please contact us if you need details about the specific legal ground we are relying on to process your Data.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To disclose data to selected third parties	(a) Identity (b) Contact	See sections 7, 8 and 9 below
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal

(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(c) Profile (d) Marketing and communications	obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this App (e.g. troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data and provide technical, product and other support to help keep this site working, safe and secure)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our App, products / services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our App updated and relevant, to develop our business and to inform our marketing strategy)

- Identity data includes first name, last name, username or similar identifier, title, date of birth and gender
- Contact data includes email address and telephone numbers
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this App
- Usage data includes information about how you use our App and services
- Profile data includes your username and password, feedback and survey responses, your interests and preferences
- Marketing and Communications data includes your preferences in receiving marketing from us and your communication preferences

6. **Using data for marketing purposes.** We will get your express opt-in consent before we share your Data with any other entities for marketing purposes. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

7. **Who we share the data with.** We may share your Data with the parties set out below for the purposes set out in the above table and third parties who process your information on our behalf where necessary to enable us to run our business.

- PCOT Ventures group company: other companies in the PCOT Ventures group and who are based in UK, EU and UAE, and provide support, IT and system administration services. We have a legitimate interest in sharing information with our group companies to better develop, modify, enhance or improve our products and services and/or communications for the benefit of our customers.
- Service providers: acting as processors who provide the following services:
 - Data storage and hosting;
 - IT security;
 - Workplace productivity and email;
 - Customer relationship management;
 - Marketing automation, solutions and analytics;
 - Communication services;
 - WebApp and app developers and hosts;
 - Accounts receivable, accounts payable and credit control; and
 - Independent contractors.
- Professional advisers: including lawyers, bankers, auditors and insurers based in UK, EU, and UAE, who provide consultancy, banking, legal, insurance and accounting services.

- Business partners: we work with businesses that provide goods and services complementary to our own. We share information with them where you have requested goods or services from us which they provide. We have a legitimate interest in using business partners to allow us to provide such goods or services which we cannot provide on our own and which enhance our service offering.
- Google Inc: as part of the Google Analytics service, information is shared with Google on an aggregated and anonymised basis. Please see Google's privacy policy located [here](#).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Data for their own purposes and only permit them to process your Data for specified purposes and in accordance with our instructions. In certain circumstances we will need to disclose your Data for legal reasons:

- (a) Compliance with a legal obligation: we may be required to disclose your Data pursuant to a court order or subpoena;
- (b) Suspicion of criminal acts or threats to public security: if we suspect potential or actual criminal conduct, we will, in certain circumstances need to contact the appropriate authority. We have a legitimate interest in sharing your Data in order to prevent or stop criminal activity; and
- (c) Enforcing our legal rights: we have a legitimate interest to enforce our legal rights or to take steps to do so and will share your Data in connection with the same.

8. **Who is receiving the data.** PCOT Ventures FZ LLE, the collector of your Data, is based in the UAE. We may also share your Data within the PCOT Ventures group. This may involve transferring your data outside the UAE and UK. We ensure your Data is protected by requiring all our group companies to follow the same rules when processing your Data. Whenever we transfer your Data out of the UAE, we will only transfer it to countries that have been deemed to provide an adequate level of protection for Data.
9. **How we retain the data.** We will only retain your Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. In some circumstances you can ask us to delete your Data. In some circumstances we will anonymise your Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.
10. **We may use cookies.** We may use 'cookies' while you access the App to avoid the need to re-enter details on different occasions. Cookies are also used to collect general usage and volume statistical information. We may use local "shared objects", also known as "Flash" cookies. Examples of other reasons include:
 - enabling us to recognise your device so that you don't have to give the same information to us several times;
 - recognising that you may already have given a username and/or password; and/or
 - measuring how you are using the App, to make the App easier to use and to ensure sufficient capacity for quick delivery.

A "cookie" is a small amount of data sent from the server and stored on your computer's hard drive. Most web browsers are automatically set up to accept cookies, but you can set your

browser to refuse cookies or ask your browser to show you where a cookie has been set up. These settings will typically be found in the 'options' or 'preferences' menu of your browser.

11. **Your data rights.** Under certain circumstances, you have rights under data protection laws in relation to your Data:

- **Request access to your Data ("subject access request"):** This enables you to receive a copy of the Data we hold about you and to check that we are lawfully processing it.
- **Request correction of your Data:** This enables you to have any incomplete or inaccurate Data we hold about you corrected, though we may need to verify the accuracy of the new Data you provide to us.
- **Request erasure of your Data:** This enables you to ask us to delete or remove Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your Data:** Object to processing of your Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your Data:** Request restriction of processing of your Data. This enables you to ask us to suspend the processing of your Data in the following scenarios:
 - If you want us to establish the Data's accuracy.
 - Where our use of the Data is unlawful but you do not want us to erase it.
 - Where you need us to hold the Data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your Data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your Data:** We will provide to you, or a third party you have chosen, your Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent:** Withdraw consent at any time where we are relying on consent to process your Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at pc@intro.company.