

## APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy ("**Policy**") relates to the use of the website [www.xcube.ae](http://www.xcube.ae) provided by xCube LLC and its respective directors, partners, officers, employees or agents (Hereafter referred as "**xCube**", "**we**", "**us**", "**our**"). xCube is the data controller of any personal information provided to us, via this website or otherwise. As part of this policy xCube also addresses the personal information collected during the mobile application onboarding process.

xCube is committed to safeguarding the privacy of the personal information that is provided to us or collected by us during the course of our business as well as the personal information we receive from you ("**User**", "**you**" or "**your**"). This Policy, describes how and why we collect, store and use personal information, and provides information about your rights. Please read the following information carefully to understand our views and practices regarding how we handle personal information.

For the purposes of applicable data protection law, xCube is the "data controller" of your personal information.

## COLLECTION OF PERSONAL INFORMATION

We may collect personal information from you through your use of the website.

We may request, and collect from you, personal information and other information. Depending on the information or services you request, we may ask you to provide your name, phone numbers, address, email address, passport details, and other such personal information.

Furthermore, as part of the enrolment process on the xCube mobile application, we may capture from you the following information: Full Name, Email Address, User ID's (Passport and/or Emirates ID), Full Address, Proof of Address, Phone number, biometric data, financial information (income/net worth) social security number, tax identification number etc.

By providing us with any personal information either through the use of the website or the xCube mobile application, you are consenting to the use of your personal information as contemplated in this privacy notice. If you do not want us to use your personal information for any of these purposes, please do not provide us with your personal information.

In addition to the personal information, you knowingly provide to us, with regard to each of your visits to our website, we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, location; browser plug-in types and versions, operating system, as well as the admin system and aggregated data reports. That data is statistical in nature and tells us about the navigational behavior and actions of our users and
- Information about your visit; services you viewed or searched for; page response times, download errors, length of visits, page interaction information (such as scrolling, clicks, and mouse-overs); and
- In addition, we may use third party services such as Google Analytics that collect, monitor and analyze information about Demographics and Navigational Behavior. Demographics may include information such as gender, country of provenance and age. Navigational Behavior may include information such as pages viewed during a session, time spent on a given page and engagement with the Site's content such as clicks and form submissions (e.g. an email subscription to our newsletter).

For that same reason, we can obtain information about your general use of the internet using cookie files, which are small files that are sent to us and which are stored in your computer, browser, or other device's hard drive. The cookies help us improve our Site as well as provide a better and more personalized service. They allow us to:

- Estimate the size and nature of our audience as well as its behavioral tendencies on our Site
- Store information about our users' preferences, which allows us to personalize our Site in conjunction with individual interests
- Accelerate your search
- Recognize you when you come back on our Site

If you wish to remove cookies, you can deactivate cookies within your browser's parameters. However, if you deactivate your cookies, you might not be able to access some parts of our Site. Unless you deactivate cookies, the system on our Site will send cookies by default

## **PURPOSES**

We will only use your personal information for our legitimate business purposes, including:

- To process and respond to inquiries, and provide our services;
- To manage our relationship with you;
- To market our services;
- To compile anonymous statistics, such as website usage statistics and statistics on the effectiveness of invitations and other emails; and
- To allow our market service provider (through whom we are able to provide our services) to comply with the regulations of all jurisdictions in which they must comply in order to provide their services; and
- Where otherwise required by law.

Your personal information collected as part of the enrolment process on the xCube mobile application shall only be used for the purpose intended. This may fall under the following categories:

- Enablement of the application's functionality after vetting personal information provided by the new user
- Developer communications
- To prevent Fraud through xCube's mobile application
- Security and Compliance
- Account Management
- Analytics

## **Client Relationship Management (CRM)**

We operate a CRM email mailing list program, which we use to inform clients and other contacts about our services, including our publications and events. Such marketing messages may contain tracking technologies in order to track subscriber activity relating to engagement, demographics and other data, and to build subscriber profiles.

If you would like to cease receiving marketing materials from us at any time, please let our CRM management team know directly. You can also change your preferences for receiving our marketing emails and updates from us at any time, and you can unsubscribe by following the instructions specified in our marketing emails.

## SHARING YOUR INFORMATION

We may disclose your personal information to a recipient (i) for the purposes of outsourcing one or more of the purposes-related functions described above; (ii) to confirm, verify or update information provided by you; (iii) to inform you of events, information about our services, and other important information, or (iv) for other purposes disclosed at, or before the time the information is collected.

If you tell us you wish to attend an event, your name and organization may appear on a list which we provide to other delegates at the event. We also take photographs and video of our events, and this may result in your image being captured and used in the course of reporting on the event (e.g. via social media or other means).

In relation to any other third parties we will only disclose your information where you have given your consent or where we are required to do so by law, or where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.

## YOUR RIGHTS

Under certain circumstances, you have the following rights:

- **Access and Accuracy:** the right to ask us to provide you, or a third party, with copies of the personal information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified in accordance with the applicable law;
- **Erasure or Blocking:** the right to request erasure, anonymization or blocking of your personal information that is processed in breach of the law;
- **Objecting:** the right to object on legitimate grounds to the processing of your personal information. In certain circumstances we may not be able to stop using your personal information, if that is the case, we'll let you know why;
- **Porting:** the right to request that some of your personal information is provided to you, or to another data controller, in a commonly used, machine-readable format;
- **Complaints:** if you believe that your data protection rights may have been breached, you have the right to lodge a complaint to the applicable supervisory or data protection authority; and
- **Withdraw consent:** when personal information is processed on the basis of consent an individual may withdraw consent at any time. In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact us on the details set out below.

If you would like to exercise any of the above rights, please contact us at [support@xcube.ae](mailto:support@xcube.ae)

## CONFIDENTIALITY

The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with this privacy notice, our professional obligations and applicable law. We do not sell, rent, distribute, or otherwise make, personal information commercially available to any third party. We may share information with our service providers for the purposes set out in this privacy notice.

## INFORMATION SECURITY

We have implemented strict administrative, technical and physical measures to protect your personal information against loss, misuse and alteration. We keep up to date and follow security best practices when setting up a layered defense model to ensure the risk of data exfiltration is kept low. We have paid great emphasis on ensuring that sensitive data in transit as well as sensitive data in storage is

protected by utilizing technologies such as encryption. Access to such data is on a need-to-know basis with only authenticated and authorized personnel being able to view or process your data.

### **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We will retain your personal information for the length of time needed to fulfil the purposes for which it was collected (as outlined in this Policy) unless a longer retention period is required or permitted by law.

Your personal information that is processed for marketing purposes will be stored until you exercise the right to withdraw consent, and once such right is exercised, your personal information will be kept only during the applicable statute of limitations period for any disputes or liabilities that may arise as a consequence of the processing of that information (which is up to 15 years in the UAE). Once potential actions are time-barred we will proceed to delete the personal data. In any other circumstances, we will only retain your personal information for a shorter or longer period as required by any applicable law.

### **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of April 1 2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically.