

# Confidentiality policy

**Valid from: May 3, 2023**

**City: Dubai, United Arab Emirates**

This Confidentiality Policy (**Policy**) defines how OneEntry (**Company**) collects, discloses and uses personal information about You, and how can You exercise your rights to confidentiality.

This Confidentiality Policy shall be applicable to personal information that we collect when You visit our website at: <https://oneentry.cloud> (**Website**), User's Personal Account at: <https://account.oneentry.cloud> (**User's Personal Account** as well as the Software or otherwise interact with us (e.g. by visiting events or communicating with us).

If You disagree with this Policy, do not use our Website or Software.

This Confidentiality Policy shall be applicable to the Content and User Profile.

The License Agreement for the use of the Software of OneEntry Portal Co. (license number 1088250) (**License Agreement**) shall govern the use of the Software, including Profile processing and work with the Content.

If connection to the Software provides for Personal Data processing (particularly by using individual software), including where fulfilment of an order for connection of the access to the Software provides for Personal Data input, the User gives its consent with User's Personal Data processing by the Company. The Company may engage third parties in Personal Data processing.

We recommend You to thoroughly consider this Confidentiality Policy so that to receive comprehensive information. However, if You wish to receive access only to a certain section of this Confidentiality Policy, You may go to this section via a relevant link in the Table of Content.

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### **1. Personal data protection guarantees**

The Company guarantees that the User's Personal Data is processed with the use of complex technical and organisational measures, procedures and operations aimed at protection of confidentiality, secrecy, safety, unity, integrity and availability of Personal Data.

## 2. Which personal data is collected by OneEntry?

Personal information that we collect about You is referred to the following categories:

- *Information provided by You*

We collect information about You whenever You access our Website or Software or otherwise provide us with Your data.

### **Creation of the Profile**

We collect information about You when You register the Profile and activate Software settings to create the Project.

### **Requests and applications**

You may provide information about a problem that you face when using the Software and send us screenshots so that we can help to resolve the problem.

You may also provide your contact information to register for our events or send a request via our Website.

### **Transactions**

We will collect information about transactions, including the Tariff Plan purchased by You and Your payment history. Please note that all information on transactions shall be sent directly to third parties' payment processors (banks, payment systems) and are protected by their confidentiality policy. The Company does not have access to this information, and we do not keep it.

- *Information that we collect from your device and its use*

We collect certain information about Your device, including how You and Your device interact with your Website or Software. Particularly information that we collect shall include Your IP-address, type of device, unique identification numbers of the device, type of browser, operating system, software installed on Your device, product keys, general information on location (e.g. received from IP-address) and link URL. We also collect information on how You and Your device interact with our Website or Software or with us by email, including pages that You visited, functions that You used, Software that You purchased, links that You clicked as well as time and duration of Your visit.

This information is partly collected with the use of cookies or similar tracking technologies as described below in section [Cookies and similar tracking technologies](#).

- *Information that we receive from third parties' sources*

From time to time, we receive personal information about You from third party sources (including social networks and other Content platforms, publicly available databases as well as from our business and sales partners and service providers).

Types of information that we receive from third parties includes name, email, position and social network profiles. We may unite this information with the information that we collect by using other methods described above. This helps us to maintain and increase the preciseness of our entries, determine new customers, send personalised messages and provide services You may be interested in.

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## 3. How does OneEntry use my personal information?

We use Your information for business and commercial purposes in order to:

- Provide, support and improve the Website and Software, including system administration, system safety and adding new functions and possibilities.
- Manage Your Profile and send You relevant information, including confirmations, updates, technical notifications, system safety warnings as well as messages concerning support and administration;
- Respond to Your comments, questions and requests as well as to provide services for servicing and support of the Users;
- Communicate with You about the Software, products, offers, surveys, events, Content and other news and information that, in our opinion, may be of interest for You;
- Track and analyse trends, use and activities relating to the website and Software as well as our message to You;
- Detect, investigate and prevent fraudulent transactions and other illegal actions, protect rights and property of the Company and other persons as well as to comply with statutory requirements;
- Personalise and improve the Website and Software as well as to provide advertising, Content and functions that correspond to Your profile and interests, remember information on Your preferences with regard to the Website and Software;
- Conduct surveys, contests, promotions, lotteries and other events; and
- Take any other actions for which the information was collected.

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#### **4. Legal framework for personal data processing**

We collect and process Your information only where:

- We need it to provide the Website or Software, particularly to register You as a new User, manage the Website or Software, provide technical support as well as to protect safety of the Website or Software;
- This correspond to our lawful interests such as advertising and promotion of the Software as well as protection of our lawful rights and interests that do not correspond to Your own interests, rights and freedoms;

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#### **5. Whom does OneEntry disclose my personal information?**

We disclose Your personal information to the following categories of recipients:

- **Partnering companies** that help us to manage and improve our Website and Software or that otherwise process personal information for the purposes described in this Policy. Protection of this Policy shall cover information that we disclose in this circumstances.
- **Third party service providers** that provide us hosting, storage, support, payment processing, invoicing, communication, analysis and other services that may require the use information about You.
- **Third party partners in the area of advertising and analysis** for advertising in the Internet on our behalf and provision of analytical services. These parties may use cookies just like us particularly for tracking and analysing data, advertising and provision of content adjusted to Your interests and better understanding of Your online activities.
- **Third party platforms** when You, Your administrator or other Users of the Software decide to install or activate third parties' applications, customisations or other platforms to be used with the Software. This may give these platform providers access to information about You, including Your name, email as well as any Content that You decide to link to these

platforms. Please note that when You use third parties' platforms Your use shall be governed by third parties' own terms and conditions and confidentiality policies.

- Any **other party that receive Your consent with the** disclosure of information.

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## **6. Cookies and similar tracking technologies**

We use cookies and similar tracking technologies (jointly referred to **cookies**) to collect and use personal information about You particularly to understand and to Your preferences as well as to collect aggregate data on Website and Software interaction.

Cookies may be related to anonymised data linked to or obtained from data voluntary provided by You to us (e.g. Your email) that we may transfer to a service provided in a hash unreadable form.

You may refuse to accept cookies, by activating a setting in Your browser that allows You to switch off cookie settings and by selecting the refusal to use cookies on the banner displayed when You visit our Website for the first time. You may find information on popular browsers and on how to set cookies parameters on browser providers' websites. You may switch off cookies, however this may affect Your ability to use or access individual parts of our Website and Software.

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## **7. How does OneEntry protect my personal information?**

We use relevant technical and organisational measures to protect Your personal information that we collect and process. Measures that we use are designed to ensure the level of safety that corresponds to the risk of Your personal information protection. However, no security system is impenetrable and given the nature of the Internet we cannot guarantee that the information shall be totally protected from unauthorised access in the course of passage via the Internet or storage in our systems or otherwise under our control. Particularly emails sent to the Company and from the Company may not be safe, therefore, You have to be especially careful when making a decision on what information You send to us by email.

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## **8. International data transfer**

In some cases Your personal information is transferred and processed outside the country of Your residence. Data protection laws existing in these countries may differ from those existing in Your country (and in some cases might not ensure relevant protection).

The Company takes the following measures when processing User's personal data:

- detection of User's personal data security threats prior to the commissioning of the personal data information system;
- application of organisational and technical measures to ensure personal data safety in the course of their processing in personal data information systems needed to fulfil requirements to personal data protection;
- evaluation of efficiency of measures taken to ensure personal data safety prior to the commissioning of personal data information system;
- defining rules for access to personal data processed in the personal data information system as well as registration and accounting of all actions taken with personal data in the personal data information system;

- control of the efficiency of measures and means used to ensure personal data security as well as control of the level of protection of personal data information systems;
- monitoring Users' activities, consideration of facts relating to violations of requirements to personal data safety.

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## 9. Data storage

We keep personal information received from you if we have a constant business need therein (e.g. to provide You a service requested by You or compliance with applicable legal, tax or accounting requirements). In certain circumstances we will need to keep Your information due to legal reasons after the termination of our relations. E.g., we may keep Your data for longer than usually when we have legal obligations to do so, consider and resolve requests and complaints, protect individuals' ownership as well as in judicial and regulatory matters. Individual terms of storage depend on the nature of information and purposes for its collection and processing as well as on the nature of any legal requirements

If we do not have constant legal business need or lawful grounds for processing your personal information, we shall either delete it or anonymise or if it is impossible (e.g. because your personal information was kept in backup archives), we shall keep your personal information in safe custody and isolate it from further processing until the deletion is possible.

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## 10. Personal data breach

In case of User's Personal Data Breach by way of unlawful or accidental access thereto, deletion, modification, blockage, copying, provision, dissemination of personal data as well as taking unlawful actions in relation to the User's Personal Data, the Company shall notify the Personal Data subject on his Personal Data breach in a timely manner in strict compliance with main provisions and principles of the Federal Law No. 45 on Personal Data Protection in the UAE (PDPL) issued on September 26, 2021 and came into effect on January 02, 2022.

## 11. Your rights to data protection

Depending on Your location, You may have the following rights to data protection. To use any of these rights, please familiarise with individual instructions below or contact us by using contact details stated in section [How to contact us](#) below.

- You may **have access, correct, update or request deletion** of your personal information by sending a request in the User's Personal Account.
- You may **object to Your personal information processing**, ask us to **limit** Your personal information processing or **request transfer of Your personal information** by sending a request to Company's email.
- You may **cancel Your newsletter subscription** sent by us to You at any time. You may exercise this right by clicking the link **to unsubscribe** or **to cancel** in emails that we send to You or otherwise following instructions provided in emails.
- If we have collected and processed Your personal information with Your consent, You may **withdraw your consent** at any time by sending a request to Company's email. Withdrawal of Your consent shall not affect legality of any processing by us prior to Your withdrawal as well as shall not affect Your personal information processing based on legal grounds other than consent.

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## **12. Children's confidentiality**

### **The Company's Website and Software are not provided for children under 18.**

We purposefully refuse to collect personal information of children under 18. If You know that a child provided us personal information without parents' consent, please contact us, by using the contact details subject to section [How to contact us](#) below. If we become aware that a child under 18 provided us with personal information without his parents' consent, we shall take measures to delete this information and close the child's profile.

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## **13. Third parties' websites**

The Website and Software may refer to third parties' websites or platforms of companies other than the Company, e.g. to relevant online resources, social network platforms, our partners' websites, payment systems and other third parties' websites. We are not responsible for a confidentiality policy or content of other websites. If You have any questions on how these other websites use Your information, You have to familiarise with their policy and contact those directly. We shall not be responsible for such third parties' actions.

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## **14. Updates to this Confidentiality Policy**

We may update your Policy from time to time as a result of legal, regulatory, technical or business changes. When updating the Policy, we take relevant measures to inform You depending on the importance of introduced changes. We shall receive Your consent with any important changes in this Policy where and when necessary in accordance with applicable data protection laws.

You will be able to see when this Policy was last updated by checking the data displayed in the beginning of this Policy.

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## **15. How to contact us**

If You have any questions or concerns regarding the use of Your personal information by us, please contact us by sending those to the Company's email or via the User's Personal Account.

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