

## **PURPOSE OF THIS POLICY**

CVLOG respects an individual's privacy and is committed to protecting the same. This Privacy Policy ("Policy") describes how personal data is collected, how it's used, disclosed and transferred, through platforms controlled by the company viz emails with the domain @cvloginternational.com and mobile sites/applications (the "Platforms") of the individuals who browse, or access the Platform or provide information on or through the Platform, or whose information the Company otherwise collects, receives or processes in connection with the offer and sale of its products ("Products") (hereinafter, collectively referred to as "Customers", "users", "you", "your") and ensure its compliance with General Data protection regulation (GDPR) and local applicable laws and regulations on personal. This Policy does not apply to Personal Information collected from you offline (unless otherwise specified), but to Company's websites that link to this Policy, to Customers of countries where CVLOG has expanded its business.

This policy along with other policies and terms and conditions governs your use of this website. By accessing and/or using our Platform and providing the information as explained in this Policy, you consent to the collection and use of the information you disclose on the Platform in accordance with this Policy, including but not limited to your consent for sharing your information as per this Policy. We encourage you to read this Policy regarding the collection, use, and disclosure of your information. If you are not comfortable with any of the terms or policies described in this Policy, you may choose to discontinue use of this Platform.

Further, you agree and consent to receive all communications related to our services on the mobile number provided by you to the Company, even if such mobile number is registered under DND/NCPR list under Telecommunications and Digital Government Regulatory Authority ('TDRA'), the authority which oversees the telecommunications sector in the UAE. You hereby express your interest and accord informed consent to receive communications (including commercial communications) in relation to the Company's services. You further confirm that no communication by you from the Company or on behalf of the Company shall be construed as call by the person under Article 72(6) of the Federal Law by Decree No. 3 of 2003 Regarding the Organisation of the Telecommunication Sector ('the Telecommunications Law') who intercepts the contents of telephone calls without prior permission by the competent judicial authorities, in such case you may be punished with imprisonment for a period of not more than one year and/or a fine of not less than AED 50,000 (approx. €12,397) and not more than AED 200,000 (approx. €49,590).

For the purpose of this Policy, the term "Personal Information" shall mean any information that relates to you or certain personally identifiable information that is to be used to contact or identify you, or which, either directly or indirectly, in combination with other information available or likely to be available with the Company, is capable of identifying you, which is submitted to and/or collected over the Platform and maintained by the Company in an accessible form, provided that, any information that is freely available or accessible in public

domain or any other law for the time being in force shall not be regarded as Personal Information for the purposes of this Policy.

## **HOW PERSONAL INFORMATION IS COLLECTED?**

Communication by us is done via email, phone or text messaging on your mobile phone, but our preferred means of communication is email which has the least impact on the environment. Such communications may involve giving to you, as well as receiving information from you. We collect and receive the Personal Information in the following ways:

When you submit your Personal Information on our Platform:

The Company collects and stores the Personal Information that you provide while using our Platform including when you enter your Personal Information into data fields on the Platform as part of a voluntary registration process. We also collect and store your Personal Information through sponsored social media platforms, events, etc. To protect your privacy, you should provide only specific details requested by us and shall not share any other details. You can always choose not to provide certain information, but it may restrict use of certain features of our Platform.

**Automatic collection:** We automatically collect and store certain types of information such as information about your use of the Platform, your interaction with content and services available through the Platform. Unidentifiable information may be collected using various technologies, such as cookies, Internet tags, and web beacons. Your Internet browser automatically transmits to the Platform some of this unidentifiable information, such as the URL of the Website you just visited and the browser version your device is operating, IP address, browser type, browser version, the pages of our service that you visited, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. Passive information collection technologies can make your use of the Platform easier by allowing the Company to provide better service, customize sites based on consumer preferences, compile statistics, analyse trends, and otherwise administer and improve the Platform. Certain features of the Platform may not work without use of passive information collection technologies. Information collected by these technologies cannot be used to identify you without additional identifiable information. We may also receive/store information about your location and your mobile device, including a unique identifier for your device.

**Other sources:** We might receive information about you from other sources, such as updated delivery and address information from third parties, which we use to correct our records and deliver your next purchase more easily. Further, we may receive information about you from third parties that feature our Products or promotional offers if you opt-in to receive information from us. You may also choose to participate in a third-party application or social media sites through which you allow us to collect (or the third party to share) Personal Information about

you, including usage information. We may also receive information, such as marketing related or demographic information about you from third parties to enhance our ability to tailor our content and offer you the Products that we believe may be of interest to you. The Company is not responsible for the privacy practices of such third-party websites which it does not own, manage or control.

## **PERSONAL INFORMATIONS WHICH WE COLLECT**

The Company limits itself to collect information which is necessary to ensure accurate services and is required to process your order of the Product or provide a refund and continually improve our Products and services.

Following are the categories of Personal Information that is collected and processed by us:

*your name, e-mail and postal addresses, phone number(s), country;*

*date of birth, language preference, location;*

*any open data and public records such as information about you that is openly available on the Internet;*

*names of people to whom purchases have been shipped including address and telephone numbers, IP addresses;*

*Product interest information and in certain circumstances, your opinions and individual preferences, etc.;*

*You may also provide us with information like financial information such as bank account or credit card or debit card or other payment instrument details, password for availing the Products at our Platform;*

*We may also maintain a record of your Product interests and acquire information about you from our future affiliates;*

*phone numbers used to call our customer service number.*

We may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to the Platform.

## **PURPOSE FOR WHICH THE PERSONAL INFORMATION IS COLLECTED**

The Company may use your Personal Information to serve, uphold, safeguard and enhance the services they offer you for the purpose of better in responding to your requests; to respond to reviews, comments, or other feedback provided to us;

administer a contest, promotion, survey or other site feature;

ask for ratings and reviews of the Products;

for the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the service.

follow up with you after correspondence (live chat, email or phone inquiries);

allow you to log in with a social media account and share activities on your social media pages;

comply with our legal obligations, policies and procedures, including compliance with relevant industry standards and the enforcement of our terms and conditions;

help us learn more about your shopping preferences;

conduct marketing and performance research to assist us in measuring our customer services, benchmarking our performance and to help us improve your shopping experiences and Product offerings;

send communication related to order updates and offers through e-mail, SMS, telephone calls social media channels and other equivalent forms of electronic communication such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services including the security updates when necessary or reasonable for their implementation.;

do internal research on our customer's demographics, interests, and behaviour to better understand and serve you;

provide you with exclusive offers at the Platform, tailor content, advertisements, and we provide you, and improve the Platform and/or for internal business purposes;

analyse trends, track Customer's web page movements, help identify you and your shopping cart for aggregate use;

to post blogs, testimonials, success stories obtained from you in our platform or to enhance your experience on the Platform and provide you access to the services being offered by us. may use the information that you may have shared with our partner entities for such posts. (By sharing these posts to us or to any of our partner entities you provide us with appropriate consent to post them in our portals as required);

determine which of the store locations containing our Products may be closest to you, provide promotional offers, and to offer Products to you;

prevent, detect, investigate and take action against crimes (including but not limited to fraud and other financial crimes), any other illegal activities, suspected fraud, or violations of Company's terms and conditions in any jurisdiction;

establish, exercise or defend legal rights in connection with legal proceedings (including any prospective legal proceedings) and seek professional or legal advice in relation to such legal proceedings; and

comply with any applicable law, regulation, legal process or enforceable governmental request of UAE.

## **LEGAL BASIS ON WHICH PERSONAL INFORMATION IS COLLECTED**

**Performance of a Contract:** We collect and process your Personal Information as necessary for the performance of our agreement with you . this includes. But is not limited to, the information required for delivering the Products ordered by you on our Platform.

**Legitimate Interest:** legitimate interests include the marketing information about our products which we send to you in order to serve you better.

**Compliance with a Legal Obligation:** We collect and retain certain information in compliance of legal obligations.

**Consent:** Finally, in certain limited situations, we rely on your consent in order to process your Personal Information. Where we require your consent in order to collect and process certain Personal Information, we seek your consent at the time of provision, and such processing will only be performed where consent is secured. You can withdraw your consent, as per this Policy where applicable, by sending an email to [info@cvloginternational.com](mailto:info@cvloginternational.com).

We may also collect and retain information from your use of the Platform. The anonymized or aggregated information is not Personal Information since we are not able to re-identify you using any means available to us from that anonymized or aggregated information. The collected information is used for a variety of functions, including to help us identify and remediate any bugs, and to improve the performance of our Platform. The Company may use such information for analytical and research purpose. We may share this information with third parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

We maintain a social media presence, such as a Facebook, Instagram, LinkedIn and a Twitter feed. You can interact with us through social media, such as by entering our contests, posting content, sharing material from our Platform, and using our social media plug-ins. When you interact with us using social media, we may receive information such as your user ID, your profile picture, photos you post, and similar information, which is often determined by your privacy settings at the relevant social media sites. We may use the information for the purposes we have described throughout this Policy. Your use of social media sites is primarily governed by the site operators' privacy policies and terms of service, and the information you share with us and with others is largely controlled by the privacy settings you have established at those sites.

**Payment Information:** Payment information is provided by you when you use the Platform to buy our Products, and it includes credit cards numbers, billing information using third-party intermediary PCI-DSS compliant service providers. The payment information is provided directly by you, via the Platform, into the PCI/DSS-compliant payment processing service to which the Company subscribes, and the Company does not, itself, process or store the payment information, except as stated herein. Further, these intermediaries are not permitted to store,

retain, or use your billing information for any purpose except for payment processing on our behalf.

If you use the Platform, you are responsible for maintaining the confidentiality of your access information and password. You are responsible for restricting access to your computer, mobile device, etc., and you agree to accept responsibility for all activities that occur under your password. We cannot secure any information that you release on your own, that you request us to release or that is released through another third party to whom you have given access. In case of our customer care support, we may record calls for quality and training purposes.

## **HOW DO WE SHARE THE PERSONAL INFORMATION COLLECTED BY US?**

Only the persons authorized by us shall have access to your Personal Information. We may share your Personal Information to service providers who perform services on our behalf to customers. These service providers will not be authorized to use or disclose such information except as when and where necessary to perform services on our behalf or in compliance of legal requirements.

If we plan to merge/sell all or substantially all of our business to another business entity or similar other transaction or be required by that business entity, we may transfer or disclose your Personal Information to that business entity who may collect, use or disclose such information for the purposes of evaluating the proposed transaction or for operating and managing the affairs of the acquired business or for other purposes identified in this Policy. We may share Personal Information with our other corporate entities who may use the said information in accordance with this Policy to help detect and prevent identity theft, fraud, and other potentially illegal acts; correlate related or multiple accounts to prevent abuse of our Platform. If you have any objection to such sharing, then we request not provide us with any information.

We may retain other companies and individuals to perform functions on our behalf consistent with this Policy. Examples include order processing companies, courier companies, data analysis Company's, customer support specialists, email vendors, web-hosting companies and fulfilment companies (e.g., companies that coordinate mailings). Such third parties may be provided with access to Personal Information needed to perform their functions but may not use such information other than on our behalf and in accordance with this Policy.

In addition, in some instances, you may be offered the opportunity to consent to the sharing of your information with a third party such as an event or promotion co-sponsor. If you consent, we will share your information with such third party and the information you provide may be used by such third party for their own purposes and in accordance with their own policies.



Notwithstanding anything contained in this Policy, we may disclose Personal Information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to any court orders or other legal processes. We may disclose Personal Information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to: enforce our Terms and Conditions or Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of our Customers or the general public.

## **RETENTION OF PERSONAL INFORMATION**

We will retain your Personal Information as long as it is reasonably required or otherwise permitted or required by applicable law or regulatory requirements of UAE. We may also retain your Personal Information so long as it is necessary to fulfil the purposes for which it was collected (including for purposes of meeting any legal, administrative, accounting, or other reporting requirements). Your Personal Information is safeguarded against inappropriate access and disclosure, as per this Policy.

We also maintain appropriate and adequate administrative, technical and physical safeguards designed to protect your Personal Information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Even if your data is deleted by us it may remain saved in backup for audit, legal and tax purpose.

## **OPTING OUT**

The Platform provides an option to all the Customers to opt-out of receiving any promotional or marketing communications from us. If you do not wish to receive any promotional or marketing communications from us, you can contact us at the address provided below:-

[info@cvloginternational.com](mailto:info@cvloginternational.com).

### **Removal of content from Customer review**

You can remove content that you posted on a public space, such as part of a ratings and review, by e-mailing details to [info@cvloginternational.com](mailto:info@cvloginternational.com).

Please note that we will endeavour and try to ensure to honour your request to remove information, however, our removal of your information does not completely erase that information from the internet viz. historical copies, or "caches," may remain.

## **WITHDRAWAL OF CONSENT**

If you have consented to the collection, use and/or disclosure of your Personal Information as identified in this Policy, you have the right to withdraw this consent at any time by writing to us at [info@cvloginternational.com](mailto:info@cvloginternational.com). Where you are providing location information via a mobile

app, you may turn off your location services on your device at any time. Please note that any processing that we have carried out before the withdrawal of your consent remains lawful. Provided that, notwithstanding such request, this information may be retained to comply with our legal obligations, resolve disputes and enforce our agreements.

## **HOW PERSONAL INFORMATION IS STORED**

We may store Personal Information using our own secure on-site servers or other internally hosted technology. Your Personal Information may also be stored by third parties, via cloud services or other technology, with whom the Company has contracted, to support the Company's business operations.

These third parties do not use or have access to your Personal Information other than for cloud storage and retrieval, and the Company requires such parties to employ at least the same level of security that we use to protect your Personal Information.

## **DISPOSAL OF PERSONAL INFORMATION**

We will only use your Personal Information for the purposes mentioned above and will make sure that your privacy is protected. We shall take reasonable steps to delete or permanently de-identify Personal Information that is no longer needed.

## **PERMISSIONS REQUIRED**

We may require some permissions related to device you are using for delivering better services. These permissions include tracking of your location, camera, SMS services and any other service which could be added from time to time.

## **USE OF "COOKIES"**

We may track your preferences and activities on the Platform. "Cookies" are small data files transferred to your computer's hard-drive by a website, while using a web browser (if you allow). They keep a record of your activities on the Platform making your subsequent visits to the site more efficient. The Cookies may store a variety of information, including, the number of times that you access the Platform, registration information and the number of times that you view a particular page or other item on the Platform. The use of cookies is a common practice adopted by most major sites to better serve their clients. Most browsers are designed to accept cookies, but they can be easily modified to block cookies.

By continuing the use of the Platform, you are agreeing to our use of cookies. If you do not agree to our use of cookie, you can block them in your browser setting, but you may lose some functionality on the Platform.



We use cookies to:

- understand and save Customer's preferences for future visits.
- keep track of advertisements.
- compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.
- you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. You may look at your browser's help menu to learn the correct way to modify your cookies.

if you turn cookies off, some features will be disabled. It won't affect the Customer's experience that makes your site experience more efficient and may not function properly.

However, you will still be able to place orders.

## **CUSTOMER COMMENTS AND CONTENT**

If you post any comments or content on our Platform, you should be aware that any information you choose to provide there may be read, collected, or used by the third parties. We are not responsible for the information you choose to submit, and we cannot guarantee that third parties have not made copies of or will not use such information in any way.

## **LINKS TO THIRD PARTY ADVERTISEMENTS OR SITES**

We may display links to web sites that are owned or operated by third parties on our Platform. Please understand that these websites are independent from the Company, and the Company has no control over the content on that website, even if the Company provides information or Products to the owner of that website. The Company is not making any representations about, endorsing, or accepting any responsibility for the content or the use of such website. Further, we are not responsible or liable for any damage or loss related to the use of any third-party website. You should always read the terms and conditions and the privacy policy of a third-party website before accessing or using it.

## **THIRD PARTY ANALYTICS**

We use third-party analytics services to evaluate your use of the Platform, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to the Platform and mobile and internet usage. These third parties use cookies and other technologies to help analyse and provide us the information and, in some cases, connect such information with other data held by our, or third party, environments. You consent to the processing of information about you by these analytics providers in the manner and for the purposes set out in this Policy.

## **CHANGES IN POLICY**

We reserve the right to modify, delete, alter and make other suitable changes to this policy from time to time. Reminders of such changes may be visible on the website provided to you but it is advised to check our policies regularly. The updated version of our policy will be enforceable as soon as it has been updated. You are deemed to accept such changes at the very first moment when you accepted this policy before using this website.

## **SEVERABILITY**

If any competent court or law finds that any provision of this policy is invalid or unenforceable, only that provision or part of provision will be deemed deleted and other provisions will not be affected

## **GOVERNING LAW**

All the provisions of this policy will be governed by the laws of UAE, including but not limited to Law No. 45 of 2021 on the Protection of Personal Data Protection ('the PDPL'), Consumer Protection Regulations ('CPR'), Cyber Crime Laws and other laws and regulation came in force from time to time. Any dispute arising out of this policy shall be subject to exclusive jurisdiction of the State commercial court of Emirate of Dubai.

## **EMPLOYMENT OPPORTUNITIES**

We provide you with a means for submitting your resume or other information through our Platform for consideration for employment opportunities at the Company. Information received through resume submissions will be kept confidential. We may contact you for additional information to supplement your resume, and we may use your information within the Company, or keep it on file for future use, as we make our hiring decisions.

## **CHILDREN**

Our Platform is not designed for individuals under the age of eighteen (18) and we do not knowingly collect Personal Information from anyone under the age of eighteen (18). If you are under eighteen (18) years of age, you may browse our Platform through your legal guardian, but please do not provide your Personal Information to us, you cannot register. If we become aware that we have inadvertently received Personal Information from a visitor under the age of eighteen (18) on the Platform, we will delete the information from our records.

## **SECURITY**

We endeavour to protect the Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the Personal Information, regardless of the format in which it is held. We use various methods to safeguard Personal Information, such as lockers, restricted areas, passwords and encryption. Firewalls are used to protect our servers and network from unauthorized users accessing and tampering with files and other information that we store.

We use regular scanning to protect documents from viruses.

Your Personal Information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. Various security measures are implemented by us to keep the information provided by you safe, however we shall not be liable to any Customer for any loss, damage (whether direct, indirect, consequential or incidental) or harm caused to the Customers due to the unauthorized access or misuse of the Personal Information by any third party.

## **PRIVACY CONCERNS**

If you are concerned about the handling of your Personal Information, or if you have any complaints or queries related to your Personal Information or our Policy, please contact:

[info@cvloginternational.com](mailto:info@cvloginternational.com).

Any complaints, abuse or concerns with regards to content and or comment or breach of these terms shall be immediately informed to the Customer Care Officer as mentioned below via mail, email or phone.

### **Customer Redressal Officer:**

CVLOG Free Zone Company with Limited Liability

Address: UAE, Dubai, DSO-IFZA-19352, IFZA Properties, Dubai Silicon Oasis

[legal@cvloginternational.com](mailto:legal@cvloginternational.com)

The Grievance Officer is identified above pursuant to the provisions of applicable laws including but not limited to Protection of Personal Data Protection ('the PDPL'), Consumer Protection Regulations ('CPR'), Cyber Crime Laws , and the rules enacted under these laws.