

PRIVACY POLICY

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Octra is a brand of Octra Portal Services FZCO (“**we**”, “**us**”, or “**our**”). Accordingly, this Privacy Notice describes how and why we might collect, receive, record, organise, collate, store, update or modify, retrieve, alter, consult, use and/or share (“**process**”) your personal information when you use our services (“**Services**”), including when you:

- Visit our website at <https://octraglobal.com>, or any website of ours that links to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at legal@octraglobal.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us in the section below.

Do we process any sensitive personal information? Some of the information may be considered “special” or “sensitive” in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties? Personal information that is publicly available that may be collected from third parties, public databases or social media platforms. We will only collect legally available personal information. Should we use a third party to collect personal information we will ensure that the personal information is transferred to or from us legally in accordance with the applicable legal provisions for the jurisdiction or in accordance with a binding contract.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other

purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information in the section below.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information in the section below.

How do we keep your information safe? We have appropriate and reasonable organisational and technical processes and procedures in place, and to protect your personal information from loss, misuse, unauthorised access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. However, we cannot guarantee absolute security, as no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe in the section below.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about privacy rights in the section below.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

FULL PRIVACY POLICY

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- job titles
- contact preferences

Sensitive Information. We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called ‘crash dumps’), and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your

IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from Third Parties

In Short: Some personal information may be collected from Third Parties, but only when that is legally permissible.

We may collect personal information from third parties when the Personal information is publicly available, such as on public databases or social media platforms. However, we will only collect legally available personal information.

Should we use a third party to collect personal information we will ensure that the personal information is transferred to or from us legally in accordance with the applicable legal provisions for the jurisdiction or in accordance with a binding contract.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services and the applicable law, including:

- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services so that we can to improve our services and support.
- **To communicate with you.** We may process your information to communicate with you via our newsletters, to provide customer support or to answer your enquiries.
- **For contractual or business purposes.** We may process your information to engage with you for legitimate business purposes, for purposes of complying

with the contract between us, to send you an invoice or to collect outstanding money from you, or to provide legal, financial or security information required by attorneys, accountants, information officers or our employees

- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences and permitted by the law in your jurisdiction. You can opt out of our marketing emails at any time. For more information, see the section “WHAT ARE YOUR PRIVACY RIGHTS?” below.
- **To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm, to exercise our rights in terms of applicable law, to protect the rights of our clients or our own, the rights of third parties or to prevent further violations.
- **To comply with the law.** We may process your information to comply with statutory requirements such as court orders, legal processes, lawful discovery requests or any other valid legal request by a law enforcement agency or public authority, including prosecution, arbitration or similar legal proceedings.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

If you are located in the United Arab Emirates (other than the Dubai International Free Centre and Abu Dhabi Global Market), this section applies to you.

Article 4 of the Federal Decree by Law No. (45) of 2021 Concerning the Protection of Personal Data provides that your personal information may only be processed with your consent. Your consent must be clear, simple, unambiguous and easily accessible, and can be withdrawn at any time. Learn more about withdrawing your consent in the section “WHAT ARE YOUR PRIVACY RIGHTS?” below.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If the processing is necessary to protect public interest.
- If the processing is related to personal information which became available and known to all by your conduct.
- If the processing is necessary to initiate any procedures of legal claim or defense of rights or is related to judicial or security procedures.
- If the processing is necessary to protect your interests as the data subject.
- If the processing is necessary to perform a contract to which you are a party, or to take measures at your request with the aim of concluding, amending or terminating the contract.
- If the processing is necessary to fulfil our specific obligations stipulated in other laws in force in the United Arab Emirates.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent in the section “WHAT ARE YOUR PRIVACY RIGHTS?” below.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Develop and display personalised and relevant advertising content for our users
 - Support our marketing activities
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is

necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time. Learn more about withdrawing your consent in the section “WHAT ARE YOUR PRIVACY RIGHTS?” below.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced

- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulation

If you are located in South Africa, this section applies to you.

The Protection of Personal Information Act 4 of 2013 (“**POPIA**”) provides that you have the right to be informed (Section 5(a), Section 18 and Section 22 of POPIA). This privacy policy acts as notification that we are collecting your personal information and the purpose for which we collect it.

The following legal bases exist to collect your Personal Information:

- **Consent:** We will collect personal information where we have your consent to do so.
- **Contract:** To render some of our services to you as our client, we may need your personal information to perform our obligations or to enter into a contract with you.
- **Legal Obligation:** To comply with know-your-client requirements or applicable law it might be legally necessary for us to collect details of your identity, address or other personal information.
- **Legitimate Interest:** We collect and process personal information where the processing protects your legitimate interests our legitimate interests or the legitimate interests of a third party to whom the information is provided. We collect and process personal information where the processing forms part of our legitimate business interests and are not in conflict with your data protection rights, your fundamental rights and your freedoms. As a general rule our desire to improve our services, enhance our technology and ensure the security of our Services and website form part of our legitimate business interests.
- **Public Duty:** We collect and process personal information where the processing is necessary for the proper performance of a public law duty by a public body.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact our Information Officer using the contact details provided in our AIA Manual.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this Privacy Notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Third Parties.** In certain instances, we may share your information with third party service providers in order to render services to you.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.

Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

Google Analytics

We may share your information with Google Analytics to track and analyse the use of the Services. The Google Analytics Advertising Features that we may use include: Google Analytics Demographics and Interests Reporting. To opt out of being tracked by Google Analytics across the Services, visit <https://tools.google.com/dlpage/gaoptout>. You can opt out of Google Analytics Advertising Features through [Ads Settings](#) and Ad Settings for mobile apps. Other opt out means include <http://optout.networkadvertising.org/> and <http://www.networkadvertising.org/mobile-choice>. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms page](#).

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this Privacy Notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at legal@octraglobal.com.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the UAE, European Economic Area (EEA), United Kingdom (UK), Switzerland, Canada and South Africa, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

In some regions (like the UAE, EEA, UK, Switzerland, Canada and South Africa), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in UAE, you may contact the [UAE Data Bureau](#) if you believe we are acting in violation of the Federal Decree by Law Concerning the Protection of Personal Data.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

If you are located in Switzerland, you may contact the [Federal Data Protection and Information Commissioner](#).

If you are located in South Africa, and you may contact the Information Officer using the contact details provided in our PAIA Manual.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at legal@octrglobal.com.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (‘DNT’) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated “Revised” date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.



12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at legal@octraglobal.com, or contact us by post at:

Octra Portal Services FZCO

c/o IFZA Property FZCO

Building A1, DDP, Dubai Silicon Oasis, Dubai, UAE

13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please submit a data subject access request by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

