

## PRIVACY POLICY

Effective May 24, 2019

### DEFINITIONS

For the purposes of this Privacy Policy the following definitions shall have the following meanings:

"**Personal Account**" means the personalized section of the Service closed for public access. Personal Account is accessed by entering authentication details on the Service login page on <https://radar.qrator.net/>: login (username) and password (access code).

"**Customer**" means a natural person, individual entrepreneur or a legal entity that registered with the Service as the Customer.

"**Operator**" means Qrator Technologies (License No. 820265), a company duly incorporated and existing under the laws of the United Arab Emirates, located at: United Arab Emirates, Dubai, Al Manara Tower, Business Bay, Office 1601-05, and its subsidiaries and affiliates.

"**Service**" are defined as information services for network incident notifications provided by the Contractor in order to provide the Customer with information about anomalies with regard to the monitored object

### GENERAL

This Privacy Policy governs collection, processing, storing and use of your personally identifiable information and other personal data required for using and/or related to your use of the **Service** available via the domain and website <https://radar.qrator.net/>, which is provided and operated by the Operator. This Privacy Policy constitutes a legally binding agreement between the person accepting the Service and this Privacy Policy ("**You**") and the Operator governing collection, processing, storing and use of your personally identifiable information and other personal data required for you using and/or related to your use of the Service and rendering of Services to you, and its provisions may be enforced against you under applicable law. Please read and review this Privacy Policy before submitting any personal data to or with help of the Service. By submitting any personal data to or with help of the Service, or otherwise accessing or using the Service, you acknowledge that you have read, understand and agree to be legally bound by this Privacy Policy without limitation. This Privacy Policy is subject to change; please review the Privacy Policy each time you access and/or use the Service. By submitting any personal data to or with help of the Service, or otherwise accessing or using the Service, you shall be deemed as having accepted the most recent version of this Privacy Policy. If you do not agree to the terms of collection, processing, storing and use of your personally identifiable information and other personal data set forth in this Privacy Policy, you may not submit any personal data to or with help of the Service, or otherwise access or use this Service in any way.

### COLLECTED AND PROCESSED INFORMATION

In certain instances of use of the Service listed below, you may be prompted by the Service to provide information that may identify you (the "**Personal Data**"). Personal Data submitted by you through and with help of the Service and collected from you via the Service may include the following information:

- full legal name;
- valid e-mail address;
- mobile phone number;
- other information from which an individual may be personally identified that may be required by the Operator and prompted for submitting from time to time via the Service.

You agree that the Operator may collect your Personal Data or Personal Data of third parties in certain instances,

such as, but not limited to:

- when you register your Personal Account within the Service;
- when you order Services via the Service;
- when you contact the Operator by e-mail;
- when you otherwise use the functionality of the Service.

You agree that all Personal Data you provide via the Service must and will be correct, truthful, current, and complete. Providing false information about your or third parties' identity is forbidden. If the Operator believes that the Personal Data you provide is not correct, current, or complete, or is false or misleading, the Operator has the right to refuse, suspend or terminate your access to the Service or any of its resources and to suspend or delete your Personal Account at any time.

You hereby agree that if you do not want the Operator and/or its designated Personal Data processing contractor to collect, process, store and/or use any of your Personal Data, you may not or will not be able to use certain functionality of the Service, order rendering of Services via the Service, or use those sections or modules of the Service that require or may require your Personal Data in accordance with their designated purpose.

### **PERSONAL DATA OF CHILDREN AND TEENAGERS**

The Service is intended for use by adults only. The Operator and its designated Personal Data processing contractor (if applicable) do not knowingly collect, process, store, use or disclose Personal Data of children.

To use the Service and submit your Personal Data, you must be both (1) at least 18 (eighteen) years of age, and (2) of legal age in the jurisdiction from which you access and use the Service. Any use by you of the Service shall be deemed to constitute your conformance with this requirement. In addition, if you provide by means and with help of the Service, Personal Data of third parties you must obtain the consent of that party to provision of his/her Personal Data by means of the Service for the purposes set forth by this Privacy Policy, as well as, in cases where it may be requested by the Operator, provide confirmation from that third party with respect to conformance to the age requirements set forth by this clause of the Privacy Policy.

The Operator reserves the right to report attempts of use of the Service by the minors to the appropriate authorities.

If the Operator has learned or has sufficient grounds to believe that Personal Data is submitted by a child or a teen instead of an adult, the Operator reserves the right to suspend the Personal Account through which the Personal Data was submitted and request provision of an e-mail address of the parent or legal guardian of the submitting person so that the Operator can notify the parent or legal guardian that their child or teen has provided Personal Data through the Service and provide an opportunity for the parent or legal guardian to request the deletion of that Personal Data from the relevant records. The Operator will contact the parent or legal guardian at the e-mail address provided and the parent or legal guardian will have 48 hours from delivery of the e-mail to advise who exactly submitted the Personal Data. If the parent or legal guardian fails to reply to the query sent to the provided e-mail address, the Operator will assume that the parent or legal guardian has not consented to collection and processing of their child's or teen's Personal Data, after which the related Personal Account will be immediately terminated and the Personal Data in question will be purged from Operator's and/or its designated Personal Data processing contractor's records.

### **PRINCIPLES OF PERSONAL DATA PROCESSING**

The Operator and/or its designated Personal Data processing contractor (when and if applicable) collect, process, store and use your Personal Data in accordance with the following general principles:

- your Personal Data is or will be at all times obtained solely from you and from you only, and not from any third party (with the express exception of cases when you provide Personal Data of third parties);
- your Personal Data are at all times collected, processed, stored and used lawfully;
- your Personal Data are collected, processed, stored and used only in accordance with the purposes of Personal Data processing outlined in this Privacy Policy and your express consents granted under this Privacy Policy;
- your Personal Data is at all times collected, processed, stored and used separately from anonymous data that may be received from you in accordance with this Privacy Policy;
- your Personal Data is at all times treated confidentially and processed, if and where applicable, only by or with

assistance of personnel working with Personal Data that have signed non-disclosure agreements;

- your Personal Data will not be disclosed or transferred to any third party without your express consent to such disclosure or transfer, with the exception of circumstances where such disclosure or transfer is performed under consents given by you in accordance with this Privacy Policy, may be required by government authorities, such as courts or law enforcement agencies, or under law, as discussed further in this Privacy Policy;
- your Personal Data is processed, stored and used only for the period set forth in this Privacy Policy;
- processing of your Personal Data by third parties, such as the Operator's designated Personal Data processing contractor (if and where applicable) will at all times be processed with the same level of confidentiality, data security and in strict accordance with the principles and purposes outlined in this Privacy Policy;
- the scope of collected Personal Data does not and will not exceed the scope of purposes for which the Personal Data is collected, processed, stored and used in accordance with this Privacy Policy;
- your Personal Data may be changed or deleted at any time upon your request in accordance with this Privacy Policy.

### **PURPOSES OF PERSONAL DATA PROCESSING**

The Operator and/or its designated Personal Data processing contractor (if and where applicable) collect, process, store and use your Personal Data solely for the following purposes:

- registering you as a user of the Service and the Customer of the Services available and provided to you by the Operator via the Service;
- providing and rendering to you the Services by the Operator by means and with help of the Service;
- sending you promotional and advertising materials relating to new functionality and/or services of the Service, new Services available by means and with help of the Service, as well as products and services of the Operator and/or its subsidiaries and affiliates and partners, including advertising partners, as well as sending you other information that you requested or agreed to receive;
- performing statistical studies basing on the Personal Data provided by you and using information obtained from user surveys completed by you for improvement and enhancement of your user experience with respect to the Service, its functionality and services;
- offering you specific functionality of the Service, including but not limited to the ability to order Services, and maintaining records of your orders of Services;
- sending you notifications relating to the Service and your use of the Service;
- using your Personal Data for Operator's internal business purposes directly relating to the Service; and
- record keeping and archival purposes.

### **YOUR CONSENTS TO PROCESSING AND DISCLOSURE OF PERSONAL DATA**

You hereby expressly acknowledge and agree that you grant the Operator, its affiliates, subsidiaries, controlling and controlled companies and designees, as well as its designated personal data processing contractor(s) (if and where applicable) your consents granted under this Privacy Policy with respect to collection, processing, storing and use of your Personal Data by yourself, voluntarily and by your free will, in your own interests and consciously.

You hereby expressly consent to the collection, processing, storing and use of your Personal Data by the Operator by all means and for all purposes outlined in this Privacy Policy and under applicable law, including, but not limited to, this Section of the Privacy Policy, and disclosure of your Personal Data in accordance with this Privacy Policy.

The Operator may from time to time engage third parties to perform certain functions on behalf of the Operator, such as hosting or operating the Service, receiving and processing payments made by you via the Service for the Services, sending e-mail communications, carrying out user behavior analysis and performing other functions. You hereby grant your express consent to the Operator to share your Personal Data with such third parties in order for them to perform such functions and to disclose your Personal Data to such parties where and when required.

The Operator may from time to time require sharing your Personal Data with other entities affiliated with the Operator, such as (but not limited to) Operator's subsidiaries and controlling or controlled entities for internal business and operational purposes. You hereby grant your express consent to the Operator to share your

Personal Data with such entities affiliated with the Operator and to disclose your Personal Data to such entities where and when required.

The Operator, where and when applicable or desirable, may engage third parties, such as the Operator's designated Personal Data processing contractor, to process your Personal Data on Operator's behalf. You hereby grant the Operator your express consent to share your Personal Data with such designated Personal Data processing contractor and to disclose your Personal Data to such contractor where and when required or desirable.

In certain instances, your Personal Data may be processed by Operator's designated Personal Data processing contractor located in a certain jurisdiction outside of your jurisdiction of domicile in which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen. You hereby grant your express consent to cross-border transfer of your Personal Data to such third parties located in jurisdictions outside of your jurisdiction of domicile and to processing of your Personal Data by same.

In certain instances, your Personal Data may be processed by Operator to fulfill your payments made or received with help of the Service, including but not limited to payments for Services ordered by you and rendered by the Operator. You hereby grant your express consent to the Operator to process any Personal Data that may be received from you during such transactions, and share your Personal Data with third parties such as payment services providers and banks in order for them to be able to fulfill your payment requests.

### **ADVERTISING AND SURVEYS**

The Operator or third party advertisers may use your e-mail address for sending you notifications and other informational and promotional materials about the new functionality and Services available via the Service or other services and products (including new services and products of the Operator or its affiliates), and the Service may display online advertisements. You hereby grant your express consent to receive such informational and advertising materials. Your e-mail address will not be used for sending you unsolicited advertising messages ("spam").

The Operator may, from time to time, conduct Service surveys with voluntary participation required to improve and enhance your user experience with the Service, with its functionality and services. You hereby grant your express consent to receive offers of participating in such surveys. If and to the extent you participate in such surveys, you hereby grant the Operator your express consent to processing of your Personal Data that you may be required to submit when completing such surveys.

### **ANONYMOUS DATA**

In addition to your Personal Data, whenever you access or use the Service and when you order the Services the Operator and/or its designated third parties may automatically or passively collect certain information relating to your Internet and Service use, such as information about your Internet service provider, your device's operating system and device from which you access and use the Service, browser type and build, type and serial number of your mobile device (where applicable), Internet protocol address, mobile network and country codes, time zone, domain name and/or URL address from which you access the Service, the pages and areas of the Service that you visited, Service functionality you used, the date and time you accessed the Service, and other information about your web surfing preferences and interests that is not personally identifiable. You hereby expressly agree that collection of such anonymous information does not constitute collection, use or other processing of your Personal Data. Notwithstanding this, you hereby grant the Operator, all of its affiliates, subsidiaries and designees, including but not limited to the Operator's designated Personal Data processing contractor your express consent for collection, use and other processing of all anonymous information described above.

Any and all anonymous information collected and processed by the Operator and/or its designated third parties is used strictly for the purposes of improving the Service, improving the Services provided and rendered, as well as for marketing purposes. You hereby agree that the Operator and/or its designated third parties are free to disclose any and all such anonymous information to third parties of their choice, including but not limited to third party advertisers and other parties.

### **ACTION REQUIRED BY LAW AND OTHER SPECIAL CIRCUMSTANCES**

Notwithstanding that the Operator, its affiliates, subsidiaries and designees, as well as its designated Personal Data processing contractor treat your Personal Data in a strictly confidential manner and do not and will not disclose it to third parties without your prior written consent or not in accordance with your consents granted under this Privacy Policy, the Operator and mentioned parties reserve the right to disclose your Personal Data to third parties at their sole discretion and without obtaining your prior consent and without notification to you in the following special circumstances:

- if you are found to be, or the Operator has reasonable grounds to believe, that you are violating the Terms of Service, and/or this Privacy Policy, and/or other any other legal agreement relating to your use of the Service;

- if such disclosure of your Personal Data is required to fulfill Operator's obligations under applicable law;
- if such disclosure of your Personal Data is required under governmental or legal requests for information, including but not limited to under the request of any governmental authorities, including but not limited to local and international police authorities and courts conducting investigations;
- if such disclosure of your Personal Data is required to respond to an emergency; or
- if such disclosure of your Personal Data is required otherwise to protect the rights, property or security of third parties, other users of the Service or the general public in any jurisdiction whatsoever.

## **DATA SECURITY**

The Operator and Operator's designated contractor performing Personal Data processing (when and if applicable) use commercially reasonable technical, organizational and administrative measures to ensure protection and security of your Personal Data. The Service and the servers hosting the Service, as well as servers of the Operator's designated contractor performing Personal Data processing (when and if applicable) utilize certain electronic security measures designed to protect against the loss, misuse, and alteration of the information under Operator's and/or Operator's designated contractor's performing Personal Data processing (when and if applicable) control, including Personal Data, which measures fully correspond to requirements set forth under applicable law. However, you acknowledge and agree that no electronic data transmission or storage of information can be guaranteed to be fully secure, and while the Operator and Operator's designated contractor performing Personal Data processing (when and if applicable) perform and will continue to perform the discussed measures to ensure protection and security of Service-related network and systems and safety of your Personal Data, the Operator and Operator's designated contractor performing Personal Data processing (when and if applicable) cannot and do not guarantee that security measures implemented on the Service will prevent third-party hackers or other malefactors from illegally obtaining information about you, including your Personal Data.

Please note that the Operator cannot ensure or warrant the security of any information you transmit via the Service, including your financial transaction information. You hereby expressly acknowledge and agree that you use the Service at your own risk.

## **COOKIE POLICY**

The technologies used in relation to the Service and rendering of Services may include cookie files. A "cookie" is a small data file that can be sent to and placed on or in your computer's or mobile device's hard drive and/or memory, whichever is applicable, when you access and use the Service. The Operator may deploy cookie files to collect, store, and sometimes track information for statistical purposes to improve the Service and the functionality and services it offers (including the Services), as well as to store user preferences, to record session information, to record user-specific information on what pages you access or visit, to record past activity on the Service to provide improved Services when you return to the Service, to ensure that you are not repeatedly sent the same advertising or notifications, and to collect other information that you send or that may be required for maintenance, improvement and enhancement of the Service. The Operator may also deploy "web beacons" and similar technology to assist with delivery of the cookie to your computer or mobile device. Please note that blocking or rejecting cookies on your computer or other device may prohibit you from accessing and/or using certain functionality or services available on the Service. You hereby expressly consent to the Operator placing the cookies on your computer's or other computing or mobile device's memory for the purposes set forth in this Section, including but not limited to Service maintenance and improvement, and accessing and using certain functionality and services of the Service.

## **THIRD-PARTY WEBSITES AND COOKIES**

The Service may contain hyperlinks to other websites or other Internet resources that are not maintained by, or related to, the Operator or its affiliates. It is your responsibility to review the privacy policies of those websites. This Privacy Policy applies only to the Service.

Advertisers and other third parties may also use their own cookies. The Operator does not control the use of such third party cookies and expressly, to the fullest extent allowed under applicable law, disclaims any and all responsibility for any information collected by third parties through use of such third party cookies.

## **TERM OF PROCESSING, UPDATING AND DELETING PERSONAL DATA**

Your Personal Data is processed and stored by the Operator and/or its designated Personal Data processing contractor (when and if applicable) for the total period required for providing you access to the Service and the ability to use the Service, providing you with notifications and sending you promotional materials, and using your Personal Data for other purposes set forth in this Privacy Policy but for no longer than 3 (Three) years as of termination of your use of the Service for any reason, if you do not request the Personal Data to be deleted before the end of that term in accordance with this Section.

If you decide to terminate your Personal Account within the Service, the above 3-year term will apply to storage of your Personal Data and your Personal Data will remain in Operator's archives for that period.

You have the right to request the Operator to update or delete your Personal Data by sending an e-mail to the following address: [radar@qrator.net](mailto:radar@qrator.net). Your Personal Data will be updated or deleted, depending on your request, in 15 (Fifteen) business days as of receipt of your request. You may also send a request to fully delete your Personal Data in writing to the Operator's address indicated within the "**Contacts**" Section of this Privacy Policy.

The Operator is under no obligation to store your Personal Data indefinitely and hereby disclaims any liability arising out of, or related to, destruction of such Personal Data.

### **CHANGE OF OWNERSHIP**

You will be deemed to have consented to the disclosure to, and use by, a subsequent owner or operator of the Service, of any information about you, including your Personal Data provided to the Operator in accordance with the relevant Agreement and this Privacy Policy, in case the Operator assigns its rights and obligations regarding such information in connection with a merger, acquisition, or sale of all or some of the Operator's assets, or in connection with a merger, acquisition or sale of all or some assets related to the Service, to a subsequent owner or operator. In the event of such a merger, acquisition, or sale, your continued use of the Service signifies your agreement to be legally bound by the privacy policy of the Service's subsequent owner or operator. This provision shall remain in full force and effect notwithstanding any termination of your use of the Service.

### **CHANGES TO PRIVACY POLICY**

To the fullest extent permitted under applicable law, the Operator reserves the right to modify, update, supplement, revise or otherwise change this Privacy Policy in order to comply with applicable new legislation and/or regulations and/or to improve the Service, and to impose new or additional rules, policies, terms or conditions in relation to the Service, collection, processing and storing Personal Data from time to time with or without notice to you. In addition, there may appear from time to time new, unanticipated uses of information collected through the Service that were not previously governed by this Privacy Policy. The Operator may notify you of the amendments to this Privacy Policy by sending an email message to the email address listed in your Personal Account and/or by posting the notice on the Service. All amendments to this Privacy Policy will be effective immediately and incorporated into the Privacy Policy upon sending and/or posting of such notice. You are responsible for regularly reviewing this Privacy Policy. Your use of the Service or any part thereof after any changes to this Privacy Policy are posted on the Service or otherwise made available for review will be considered your acceptance of those changes and will constitute your agreement to be legally bound thereby. If you object to any such changes, your sole recourse will be to terminate your Personal Account, request deletion of your Personal Data and stop using the Service.

### **CONTACTS**

If you have any comments or questions concerning this Privacy Policy, processing and use of your Personal Data, or if you would like the Operator to update or delete your Personal Data, please contact the Operator using the following contact details:

**Operator address:**

**For questions regarding the Privacy Policy and Personal Data processing:** [radar@qrator.net](mailto:radar@qrator.net)]

**To request update or deletion of your Personal Data:** [radar@qrator.net](mailto:radar@qrator.net)