## **Privacy Policy**

### Effective Date: 20<sup>st</sup> February 2020

This Privacy Policy covers the privacy practices of GLOBAL TECH HUB SPV LIMITED and its subsidiaries ("GTH SVP") in relation to the use of the GTH SVP applications and services made available via the internet ("Services") by investors, start up projects, partners ("the User" or "You"). This Privacy Policy describes how GTH SVP in its role as data controller collects, uses, and discloses certain personal information obtained through its website at <a href="https://gth.global">https://gth.global</a>. By visiting the Site, you accept and consent to the provisions set out in this Privacy Policy. If you do not agree to the Privacy Policy or the Terms of Use you may not use the Site.

GTH SVP reserves the right to modify content on its Site and this Privacy Policy from time to time without prior notice. Please check the Privacy Policy frequently and particularly before you submit additional personal information via the Site. All revisions to this Privacy Policy will be posted on the Site via a link from the homepage.

## **INFORMATION COLLECTED**

In connection with the User's access and use of the GTH SVP Services and its service providers may collect both personal information and non-personal information ("Information"). In general, you can visit our Site without revealing any information about yourself. In some cases, including when you are wishing to get services through the Site, GTH SVP may ask you to register and provide personal information. GTH SVP undertakes to make sure that clear notice and choice is provided to all visitors of the Site before the personal Information is collected, and that they have opted-in to GTH SVP use of their data.

#### **Personal Information**

Personal information is information that either identifies an individual or relates to a specific individual.

GTH SVP collects, processes, or uses the following personal data, if the User actively provides this information to GTH SVP:

 $\cdot$  first name, last name, date of birth, email address, postal address, country, job title, telephone number, fax number, company name and additional information that the User provides when contacting GTH SVP using the Site, especially information provided in free text fields of contact forms ("contact data"),

 $\cdot$  other data that you have provided in comments on the Site, especially using the forms of the discussion boards or the comment functions of the blogs,

 $\cdot$  data that you have sent to us during an online job application, including your CV, certificates, reports, job references etc.;

 $\cdot$  email address, phone number, name, company name and country provided when subscribing to a newsletter or other marketing information of GTH SVP.

Besides that GTH SVP also processes the following personal data, which is passively collected:

 $\cdot$  personal data sent by your web browser, i.e. information about your type of web browser, your operating system and selected settings (e.g. language, region, font size, font types and other configuration) may be collected ("browser data");

 $\cdot$  your IP address, information about the amount of data transferred, stored in access log files ("usage data").

## **Non-personal Information**

Non-personal information is information that does not reveal a person's specific identity or relates to a specific individual and may include electronic interaction information, geographic or geo-location information, statistical and aggregated information. While statistical and aggregated information may be derived from personal information GTH SVP will anonymize any personal information prior to sharing this information with third parties.

## **Types of Cookies**

The Site uses "cookies" to help you personalize your online experience. A cookie is an identifier, which is stored on your device by your browser, if your browser is configured to do so. Most browsers can be configured to reject cookies or to inform you, when a cookie is stored. By using cookies, GTH SVP collects, processes, and uses your personal data in pseudonymous form for promotional and market research purposes and to adjust the Site to your interests (unless you have opted out of this), for displaying or sending you -if applicable with your consent information about us and to keep you updated about our products and services that might be of interest to you. Based on this technology we might get reports from our service providers that include references to personal or aggregated data. Aggregated data might include data like general demographic or usage characteristics describing the visitors of our Site.

The legal basis for the collection of information by means of required cookies is either the necessity to carry out the contract (via the use of our Site, if we have concluded such a contract with you) or a balance of interests between ours or the interests of third parties who set and use cookies and have a legitimate interest in the functioning of the Site and your interests in a minimized use of your personal data.

You may find the following cookies that are used on the Site: (i) the required cookies which enable the navigation and basic functionality of the Site, e.g. access to protected areas of the Site;

(ii) the functional cookies allow to analyze your website usage and your selections on the website (e.g. your login name, language, or region), so we can remember these settings and to offer you a more personal experience on our Site; these cookies can also be used to remember settings like font size, font style and other configurations that you have chosen on the Site; (iii) advertising cookies with their related services help us to analyze and monitor the effectiveness of our marketing activities. In some cases we make use of third-party service providers to track and analyze statistical

information about the usage and scope of content that is used by individual users of our Site. This might result in cookies being set by the service providers to track the performance of our advertisement. These cookies might, for example store information about the browsers that have been used to visit our Site. The information provided to third-party providers by us does not include personal information, but the collected information might be linked with other personal information gathered elsewhere.

Besides that we have contracts with advertising networks. These advertising networks track your online activities and navigation over time and across multiple websites or other online services by setting cookies. This might result in information being tracked about you across multiple browsing devices, like your PC or laptop, smartphone, or tablet. Third-parties use such information to target advertising for products and services based on your personal interests. This might result in advertisement being displayed on any of your browsing devices.

The Site makes use of <u>Google Analytics</u>, a web analysis service of Google, Inc. ("Google"). Google Analytics collects data about website usage by using cookies. The data collected by using the cookies, including your IP address, are stored and processed on server of Google. Google will use this information for the purpose of evaluating your use of our Site, compiling reports on your activities and providing other services relating to your activities and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. More information about Google Analytics can be found on their pages about their <u>Terms of Service</u> and Google's <u>Privacy Policy</u>.

The User can stop the placement of cookies on its device by using the opt-out options. In addition, the User can use the browser settings to control and restrict the placement of cookies. In this respect the User can also delete existing cookies. However, this can lead to a restriction of the functionalities of our Site.

#### Log Files

GTH SVP makes use of log files for statistical purposes and internal system specific purposes. GTH SVP also collects, processes, and uses your usage data in combination with your IP address and information about the amount of transmitted data stored in log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and number of clicks to analyze trends, administer the site, track user's movement around the Site, and gather demographic information. IP addresses and other such information are not linked to any information that is personally identifiable. The log files are used to statistically analyze visits on the Site. The data is being deleted after it has been analyzed for statistical purposes.

#### PURPOSES OF THE DATA PROCESSING

GTH SVP collects, processes, and uses the Information for purposes which you have consented to or for the purposes of providing the Services that you want to get while using the Site, including but not limited to:

-downloads, discussion boards, individual requests (e.g. using our contact form), blogs;

-registration to our courses and other offerings;

-the creation of statistics and the improvement of the Site and the offered services in order to ensure the security of the Site;

-if you have consented to it, for marketing purposes especially sending our email newsletters or advertisements; if you receive a marketing e-mail from GTH SVP, you will generally be provided with an automated way to unsubscribe from that marketing e-mail sent by GTH SVP;

-for purposes of contract management and processing your enquiries and requests;

-for purposes of administering the program and system, such as maintaining account information, sending payments, etc.;

-for purposes of improving or marketing the Services.

The lawfulness for the data processing is the performance of a contract or steps prior to entering into a contract. Using the personal data is required to provide the contractual obligations. Without this personal data you would not be able to receive the services offered by GTH SVP.

The non-personal Information that GTH SVP collects is used for marketing and sales efforts to better target advertisements and other content to individuals in an effort to create a personally relevant experience for each person. The data is also used to predict responses to advertisements, and to help determine which ads perform best and which content is most appropriate for different individuals.

Providing the direct marketing data and browser data is optional. If you do now provide this data, you will not receive any direct marketing information from us and your data will not be used to improve your user experience and will not be used for statistical purposes.

# **DATA RECIPIENTS**

All personally-identifiable data is maintained in strict confidence by GTH SVP and will be treated with the same level of respect and care that GTH SVP treats its other proprietary information and trade secrets.

GTH SVP contracts with third parties to administer, host, distribute, resell, and/or support the Services. These third-party services providers have access to personal information only for the limited and specific purpose of performing services on GTH SVP's behalf and are expressly obligated not to disclose or use personal information for any other purpose.

GTH SVP has contracted external data processing service providers to collect, process, or use personal data on behalf and according to the instructions of GTH SVP. Such service providers

support GTH SVP, especially relating to hosting and operating the websites and blogs, marketing purposes, statistical analysis, improving the websites and sending our email newsletters. These service providers may be located outside the European Union or the European Economic Area which means that the level of protection in respect to data protection law might differ from the level of protection provided by European data protection law.

Unless there is an adequacy decision by the EU Commission for these states or the transfer is based on an exemption provided for by the GDPR (e.g. express consent, assertion, exercise or defense of legal rights), we take all necessary measures to ensure that transfers to such organizations are adequately protected, e.g. by signing the standard contractual clauses stipulated by the EU Commission with the data recipients.

A transfer of data to official authorities in countries outside the European Union or the European Economic Area (so-called third countries) takes place, if required by law, you have given us your express consent or this is legitimated by the legitimate interest of us or the third party for data protection purposes, e.g. internal administrative purposes and no higher legitimate interests on your part.

The Information may be shared, from time to time, with the following third-parties, including but not limited to:

· investors or partners who enter into business relationships with GTH SVP;

 $\cdot$  vendors in providing administrative services such as billing, delivery and payouts, or for other services related to providing a GTH SVP product or service;

 $\cdot$  third party who provides substantially similar services as the original service signed up for, if GTH SVP decide to stop providing such services.

GTH SVP reserves the right to disclose any Information as GTH SVP in its sole discretion, believes necessary: (i) to satisfy or comply with any applicable law, regulation or legal process or to respond to lawful requests, including subpoenas, warrants or court orders; (ii) to protect the GTH SVP's property, rights and safety and the rights, property and safety of third parties or the public in general; and (iii) to prevent or stop activity GTH SVP considers to be illegal or unethical.

Any third-party so used will be required to enter into a confidentiality and non-disclosure agreement with GTH SVP upon terms and conditions consistent with the policies set forth herein.

#### **International Data Transfers**

This Site may be hosted on the web servers outside the EU. If you are located in the EU jurisdiction you agree that the provision of the Information or other access to the Site constitutes your consent to the transfer of such data/information, including Personal Information, to the jurisdiction where the Site is hosted that may not provide an equivalent level of data protection to the laws in your home country however we have procedures in place to ensure the protection of your information, including your Personal Information.

#### **DATA PROTECTION MEASURES**

GTH SVP implements the technical and organizational measures that are commercially reasonable in relation to the respective purpose of data protection, in order to protect the information provided by you against abuse and loss. Such data is stored in a secure operating environment that is not accessible to the public. In addition, each of our employees is instructed on data protection and obliged to enter into a confidentiality agreement. Any data that is stored on GTH SVP's or the third party servers is treated as proprietary and confidential and is not available to the public. Please keep in mind, however, that the Internet is not a 100% secure medium. Therefore, although we use industry standards to protect information, the possibility of somebody defeating our security measures does exist.

#### **CONTACT**

Upon your request, GTH SVP will provide you with information as to whether – and if so, which – personal data we store in relation to you. Should your personal data be incorrect, you may have this rectified immediately. Any such information or modification is free of charge.

Moreover, you are entitled to revoke your consent to use your personal data in the future, in whole or in parts. Should you desire to do so, we will delete or block your relevant data. In order to assert such rights, please contact - Elena Privalova.

Please feel free to direct any questions, comments, or complaints regarding this privacy statement or the privacy practices of GTH SVP to:

Address: United Arab Emirates, Abu Dhabi, 2407ResCowork 02,, 24, Al Sila Tower, Abu Dhabi

Global Market Square, Al Maryah Island. Registered Number : 000002740. Email: ep@gth.global

In the event that any material changes are made to the company's privacy practices, we will promptly make changes to this Privacy Policy that discloses the changes through our websites.

#### **GOVERNING LAW**

All matters relating to your access to and use of the Site shall be governed by and construed in accordance with the laws of the country in which GTH SVP has its registered office.