

## **PRIVACY POLICY**

The present personal data processing policy ('Policy) describes both the personal data processing by **I.T.D. GROUP FZE** ('Company', 'We') and which rights you obtain owing to this processing.

### **Protecting Your Privacy**

Your privacy is very important to us. We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. Please read this privacy policy to learn more about the ways in which we use and protect your personal information. We want you to fully understand our privacy practices.

The privacy practices of this statement apply to our services available under the domain and subdomains of this website (the "Site"). By visiting this website, you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our Site. This Privacy Policy describes the information, as part of the normal operation of our services, we collect from you and what may happen to that information. Although this policy may seem long, we have prepared a detailed policy because we believe you should know as much as possible about our practices so that you can make informed decisions. By accepting the Privacy Policy and any other agreement presented to you on the Site, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is effective upon acceptance in registration for new registering users and for all users.

### **Information Collection**

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customized experience. This allows us to provide services and features that most likely meet your needs, and to customize our service to make your experience safer and easier. We only collect personal information about you that we consider necessary for achieving this purpose.

In general, you can browse the Site without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. If you choose to use our services, we may require you to provide contact and identity information, billing information and other personal information as indicated on the forms throughout the Site. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature. Under some circumstances, we may require some additional financial information.

We automatically track certain information based upon your behavior on the Site. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve you and our community. This information may include the URL that you just came from (whether this URL is on the Site or not), which URL you next go to (whether this URL is on the Site or not), your computer browser information, and your IP address.

We use data collection devices such as "cookies" on certain pages of the Site to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed

on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a “cookie”. We also use cookies to allow you to enter your password less frequently during

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a session. You are always free to decline our cookies if your browser permits, although in that case, you may not be able to use certain features on the Site and you may be required to re-enter your password more frequently during a session. Additionally, you may encounter “cookies” or other similar devices on certain pages of the Site that are placed by third parties. For example, if you view a web page created by a user, there may be a “cookie” placed on that web page. We do not control the use of cookies by third parties. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities on the Site, we may collect such information into a file specific to you.

### **Communications from the Site**

On rare occasions, it is necessary to send out a strictly service-related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. Generally, users may not opt out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.

We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account, we reply via email or phone, in accordance with the user’s wishes.

### **Sharing Information**

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our Website.

We share aggregated demographic information with our partners and advertisers. This is not linked to any personally identifiable information.

We share Web site usage information about users with reputable advertisers for the purpose of targeting our Internet banner advertisements on this site and other sites. For example, we use cookies and clear GIFs on this site, which allow them to recognize a user’s cookie when a user visits this site. The information they collect and share through this technology is not personally identifiable.

### **Other Corporate Entities**

We share much of our data, including personal information about you, with our joint ventures that are committed to serving you throughout the world. To the extent that these entities have access to your information, they will treat it at least as protective as they treat information they obtain from their other users. Our subsidiaries and joint ventures follow privacy practices no less protective of all users than our practices described in this document, to the extent allowed by applicable law.

In the event we go through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users’ personal information will, in most instances, be part of the assets transferred.

## **Choice/Opt-out**

Our users are given the opportunity to 'opt-out' of having their information used for purposes not directly related to our Site at the point where we ask for information. Users who no longer wish to receive communications may opt-out of receiving these communications by replying to unsubscribe in the subject line

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in the email or emailing us. Users of our site are always notified when their information is being collected by any outside parties. We do this so our users can make an informed choice as to whether or not they should proceed with services that require an outside party.

## **Links**

This Website contains links to other sites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. This privacy statement applies solely to information collected by this Web site.

## **Security**

This Web site takes every precaution to protect our users' information. When users submit sensitive information via the Web site, their information is protected both online and off-line. When our registration/order form asks users to enter sensitive information (such as credit card number and/or social security number), that information is encrypted and is protected with the best encryption software in the industry – SSL. While on a secure page, such as our order form, the lock icon on the bottom of Web browsers such as Google Chrome or Mozilla Firefox becomes locked, as opposed to unlocked, or open, when users are just 'surfing'.

While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, a customer service representative) are granted access to personally identifiable information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Finally, the servers that store personally identifiable information are in a secure environment.

## **Correcting/Updating/Deleting/Deactivating Personal Information**

If a user's personally identifiable information changes (such as zip code, phone, email or postal address), or if a user no longer desires our service, we provide a way to correct, update or delete/deactivate users' personally identifiable information. This can usually be done by emailing our Customer Support or contacting us by telephone or postal mail at the contact information listed below.

## **Notification of Changes**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the

homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If, however, we are going to use users' personally identifiable information in a manner different from that stated at the time of collection we will notify users by posting a notice on our Site for 30 days.

## **Definitions & Service**

Service is the <https://itdgroup.io/> website operated by **I.T.D. GROUP FZE**.

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## **Personal Data**

Personal Data means data about a living individual who can be identified from that data (or from those and other information either in our possession or likely to come into our possession).

## **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## **Cookies**

Cookies are small files stored on your device (computer or mobile device).

## **Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

## **Types of Data Collected**

### *Personal Data*

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally, identifiable information may include, but is not limited to:

*Email address*

*Name*

*Phone number*

## **Cookies and Usage Data**

### *Usage Data*

We may also collect information about how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain

information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

#### **Examples of Cookies we use:**

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Session Cookies. We use Session Cookies to operate our Service.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Security Cookies. We use Security Cookies for security purposes.

Use of Data

#### **We uses the collected data for various purposes:**

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so •
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service •
- To monitor the usage of the Service
- To detect, prevent and address technical issues

#### **Transfer Of Data**

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### **Disclosure of Data**

##### *Legal Requirements*

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation

- To protect and defend the rights or property
- To prevent or investigate possible wrongdoing in connection with the Service

- To protect the personal safety of users of the Service or the public
- To protect against legal liability
- As an European citizen, under GDPR, you have certain individual rights. You can learn more about these guides in the GDPR Guide.

### **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### **Service Providers**

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We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

### **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party’s site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Children’s Privacy**

Our Service does not address anyone under the age of 18 (“Children”).

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**Contact Us**

If you have any questions about this Privacy Policy, please contact us:

By email: [contact@idgroup.io](mailto:contact@idgroup.io)