

ILGAMOS INTERNATIONAL LTD.

Privacy Policy

effective from: 11th November 2019.

1. Preamble

Present document is the Privacy Policy of of **Ilgamos International Ltd.** (seat: Suite 1901, Level 19, Boulevard Plaza Tower 1, Sheikh Mohammed Bin Rashid Boulevard, Downtown Dubai, P O Box 27363, Dubai – United Arab Emirates, represented by: Géza Kapitány CEO) (hereinafter referred to as: “Ilgamos” or “we”) which covers the principles and important aspects of the collection and protection of personal data that we may collect about data subjects (hereinafter jointly referred to as: “You” or “client”)

According to our Terms and Conditions (available at: www.ilgamos.com/terms), upon registration to the Ilgamos service and during your relationship with Ilgamos, partners are required to provide certain registration data so that we may create their Ilgamos account. During the registration process and the relationship with Ilgamos partners may be required to provide certain personal data, the processing and protection of which shall be performed by Ilgamos according to present Privacy Policy.

We carefully safeguard the information we hold about you, including your personal data and in particular, we are responsible for the security of sensitive client data we process or may transmit on your behalf. Ilgamos is the exclusive data controller of your Personal data that you provide to us. If you wish to contact your data controller in all matters related to the processing of your Personal data, please contact our Customer Service at ..@ilgamos.com

2. Principles of data protection

Ilgamos shall perform the collection, protecting and processing of data according to the following principles.

Any and all data shall be:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals (‘lawfulness, fairness and transparency’);
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (‘purpose limitation’);
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals (‘storage limitation’);

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).”

(g) Ilgamos shall protect all data securely and diligently in order to prevent the unlawful access, loss, destruction or damage thereof.

3. The aspects, methods and purposes of collecting and processing data

In order to meet the requirements set forth in the above principles, Ilgamos hereby describes the following aspects regarding the collecting and processing of data:

- data being collected
- purposes of data processing
- location of storage/processing
- duration of storage/processing
- data transfer.

3.1. Partner data

3.1.1. Data being collected

In order to become a partner of Ilgamos and thus become able to use the Ilgamos services, it is required that you create your own Ilgamos account.

By registering to Ilgamos, partners expressly acknowledge and accept the Terms and Conditions (available at: www.ilgamos.com/terms) and the provisions of present Privacy Policy.

In accordance with our Terms and Conditions we collect the following data from our registered Partners:

- name,
- username,
- email address,
- password,
- date of birth.
- address (city, zip code, country) – for billing purposes
- phone number
- Ilgamos ID (generated after successful registration) and position

3.1.2. Purposes of data processing

Ilgamos collects the above personal data with the purpose of being able to perform its contractual obligations, and also for the purpose of being able to issue invoices or perform payments to its partners.

Especially during events, Ilgamos may take or require photos from its partners. These serve different know-your-client and anti money laundering purposes.

3.1.3. Location of storage/processing

Ilgamos stores any and all collected data on its secure servers in digital format. Certain data may occasionally be printed out in order to comply with the authorities or for ease-of-use during special events.

In case the issuance of an invoice becomes necessary or in case the performance of a payment to the partner requires it, Ilgamos shall occasionally transfer billing information to its accountant(s). In case of such transfer the billing information may temporarily be stored on the servers of the accountant(s).

All personnel of Ilgamos are under strict obligations of secrecy, and are not allowed to take or transfer data from the servers of Ilgamos.

3.1.4. Duration of storage/processing

Ilgamos stores partner's data for as long as the partner remains in the partnership-relationship with Ilgamos. In the event that the partner or Ilgamos ends the relationship, after the successful deletion of the partner's account, Ilgamos shall immediately destroy any and all data that may be stored on its servers or may be available in any format.

3.1.5. Data transfer

In case the issuance of an invoice becomes necessary or in case the performance of a payment to the partner requires it, Ilgamos shall occasionally transfer billing information to its accountant(s). In such cases the accountant(s) of Ilgamos act as data processors, and are required to keep any and all data secret and safe. Any and all data thus transferred to the accountant(s) shall be deleted by the accountant(s) after the purpose of the data transfer has been successfully executed or if it becomes unnecessary.

3.2. Employee data

3.2.1. Data being collected

Ilgamos concludes individual work contracts with its employees, and employees are subject to the provisions of said contracts.

In addition to any data expressly specified within the work contracts, Ilgamos shall collect from its employees the following data:

- name,
- email address,
- date of birth.
- address (city, zip code, country)
- phone number

3.2.2. Purposes of data processing

Ilgamos collects the above personal data with the purpose of being able to perform its contractual obligations, and also for the purpose of being able to perform payments – or if necessary, issue invoices - to its employees.

Especially during events, Ilgamos may take or require photos from its employees. These serve the purpose of being able to identify Ilgamos personnel and also to be able to create badges or other passes that may be necessary for the execution of a successful event.

3.2.3. Location of storage/processing

Ilgamos stores any and all collected data on its secure servers in digital format. Certain data may occasionally be printed out in order to comply with the authorities or for ease-of-use during special events.

For the purpose of being able to perform payments to its employees or in case the issuance of an invoice becomes necessary, Ilgamos shall occasionally transfer billing information to its accountant(s). In case of such transfer the billing information may temporarily be stored on the servers of the accountant(s).

All personnel – including the accountants - of Ilgamos are under strict obligations of secrecy, and are not allowed to take or transfer data from the servers of Ilgamos.

3.2.4. Duration of storage/processing

Ilgamos stores its employees' data for as long as their employment at Ilgamos lasts. In the event that the employee or Ilgamos ends the relationship with Ilgamos, after the successful deletion of the partner's account, Ilgamos shall immediately destroy any and all data that may be stored on its servers or may be available in any format.

3.2.5. Data transfer

For the purpose of being able to perform payments to the employee, and in case the issuance of an invoice becomes necessary, Ilgamos shall occasionally transfer billing information to its accountant(s). In such cases the accountant(s) of Ilgamos act as data processors, and are required to keep any and all data secret and safe. Any and all data thus transferred to the accountant(s) shall be deleted by the accountant(s) after the purpose of the data transfer has been successfully executed or if it becomes unnecessary.

3.3. Business-partner data

3.3.1. Data being collected

Ilgamos concludes individual contracts with any of its business-partners. Ilgamos and its business-partners are subject to the provisions of such contracts.

In accordance with the individual contracts, Ilgamos collects certain personal data from the personnel of its business-partners:

- name and position
- email address,
- address (city, zip code, country) – for billing purposes
- phone number

3.3.2. Purposes of data processing

Ilgamos collects the above personal data with the purpose of being able to perform its contractual obligations, to be able to keep contact with the personnel of the business-partner and also for the purpose of being able to issue invoices or perform payments towards them.

Especially during events, Ilgamos may take or require photos from the personnel of its business-partners. These serve different know-your-client and anti money laundering purposes.

3.3.3. Location of storage/processing

Ilgamos stores any and all collected data on its secure servers in digital format. Certain data may occasionally be printed out in order to comply with the authorities or for ease-of-use during special events.

In case the issuance of an invoice becomes necessary or in case the performance of a payment to the business-partner of any of the personnel thereof requires it, Ilgamos shall occasionally transfer certain billing information to its accountant(s). In case of such transfer the billing information may temporarily be stored on the servers of the accountant(s).

All personnel of Ilgamos are under strict obligations of secrecy, and are not allowed to take or transfer data from the servers of Ilgamos.

3.3.4. Duration of storage/processing

Ilgamos stores the data of its business-partners for as long as the partner remains in the partnership-relationship with Ilgamos. In the event that the business-partner or Ilgamos ends the relationship, after the successful settlement of any and all payments or other matters, Ilgamos shall immediately destroy any and all data that may be stored on its servers or may be available in any format.

3.3.5. Data transfer

In case the issuance of an invoice becomes necessary or in case the performance of a payment to the business-partner requires it, Ilgamos shall occasionally transfer billing information to its accountant(s). In such cases the accountant(s) of Ilgamos act as data processors, and are required to keep any and all data secret and safe. Any and all data thus transferred to the accountant(s) shall be deleted by the accountant(s) after the purpose of the transfer is successfully executed or becomes unnecessary.

3.4. Data collected by cookies

3.4.1. Data being collected

The website of Ilgamos uses so-called cookies to make the use of the Ilgamos website(s) easier and more comfortable for the visitors. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our services.

The Ilgamos website(s) use the following types of cookies:

- Session cookies
- First-party cookies
- Secure cookies
- ...

3.4.2. Purposes of data processing

The use of cookies on the website(s) make the user experience more comfortable and help Ilgamos monitor the number of visitors on the website(s). Our cookies are all safe to use and do not aim to threaten or otherwise risk the security of the personal data of the visitors.

3.4.3. Location of storage/processing

Ilgamos stores any and all data collected by cookies on its secure servers in digital format.

3.4.4. Duration of storage/processing

Different kinds of cookies are stored for different durations. Data collected by session cookies are immediately and automatically deleted after each session (i.e. the closure of the internet browser). Certain other cookies may store user data for as long as the user deletes them.

3.4.5. Data transfer

The cookies used by the Ilgamos website(s) transfer **anonymous data** to the following third parties:

- ...

3.5. Data of Minors

The services of Ilgamos are not available for users under the age of 18 (or the age of legal consent according to the jurisdiction the client is located in) (a “Minor”). We do not knowingly collect, store or process personal information from or about Minors. If you are a Minor, you should not use any of our services nor provide any personal information to us. If we become aware that a Minor has shared any information with us, we will immediately delete such information. If you have any reason to believe that a minor has shared any information with us, please contact our Customer Service at ..@ilgamos.com.

4. How we use the Personal data

We use the Personal data for security, identity verification purposes, to communicate with you and to comply with the law.

Specifically, if it is compliant under the applicable law, we may use the Personal data to pursue our legitimate interests, e.g.:

- carry out regulatory checks and meet our obligations to our regulators,
- prevent and detect fraud, money laundering and other crime (such as identity theft),
- tell you about products and services which may be of interest to you (direct marketing),
- develop and improve our services through assessment and analysis of the personal data including market and product analysis, and market research.

We will never pass the personal data to a third party for them to use in their own direct marketing without your consent.

5. Requirement to update your personal data

To comply with the law and for your own security, it is essential that you keep us informed of changes to your contact, personal details or any other important changes that are relevant to us (for example residential address, mobile phone number, email address) as applicable to your Account.

6. Miscellaneous provisions

Ilgamos reserves the right to change any provisions of present Privacy Policy whenever it becomes necessary. Ilgamos will not reduce your rights under present Privacy Policy without your explicit consent.

Whenever changes to present Privacy Policy are being made, we always indicate the date the last changes were published and we offer access to archived versions for your review.

If European Union (EU) data protection law applies to the processing of your information, we provide the controls described in this policy so you can exercise your right to request access to, update, remove, and restrict the processing of your information.

Ilgamos strongly encourages all its clients to protect their personal data. Do not tell your personal information or passwords to anyone, as doing so will increase the chance of data theft, impersonating and other security threats.

The Ilgamos website(s) may include links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any such third-party websites. Our Terms and Conditions and our present Privacy Policy apply only to information collected by us in accordance with this Policy.