

Privacy Policy Preview

PRIVACY NOTICE

Last updated August 01, 2024

This privacy notice for CPShub ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you access www.CPShub.com or other online platforms or Applications owned by CPShub.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please email us on info@CPShub.com before you use our Services.

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.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we collect any information from third parties? We may collect information from public databases, marketing partners, social media platforms, and other outside sources. Learn more about <u>information collected from other sources</u>.

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 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.

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 your privacy rights.

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



Want to learn more about what we do with any information we collect? Review the privacy notice in full.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

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

Definition of Personal Data

Personal data, also known as personal information, refers to any data that can identify an individual. This excludes data where the individual's identity has been removed, making it anonymous.

Categories of Personal Data Collected

We may collect, use, store, and transfer various types of personal data about you, categorized as follows:

- **Identity Data**: Includes your name, username or similar identifier, title, and gender.
- Contact Data: Includes your address, email address, and telephone numbers.
- Financial Data: Includes bank account and payment card details.
- Transaction Data: Includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data**: Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.



- Profile Data: Includes your username and password, purchases or orders made by you, your interests, preferences, and feedback.
- Usage Data: Includes information about how you use our website, products, and services.
- Marketing and Communications Data: Includes your preferences in receiving marketing from us and third parties and your communication preferences.

Aggregated Data

We also collect, use, and share Aggregated Data such as statistical or demographic data for various purposes. While Aggregated Data may be derived from your personal data, it is not considered personal data under the law because it does not directly or indirectly identify you. For example, we may aggregate your Usage Data to determine the percentage of users accessing a specific website feature. However, if Aggregated Data is combined with your personal data in a way that can directly or indirectly identify you, it will be treated as personal data in accordance with this privacy policy.

Special Categories of Personal Data

We do not collect any Special Categories of Personal Data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. We also do not collect any information about criminal convictions and offences.

Failure to Provide Personal Data

If we are required by law or under the terms of a contract to collect personal data from you and you fail to provide that data when requested, we may be unable to comply with the law or fulfill the contract we have or are attempting to enter into with you (e.g., to provide goods or services). In such instances, we may need to cancel a product or service you have with us, but we will notify you of this at the time.

We collect personal information that you voluntarily provide to us when you register on the Services, 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.

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.



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, including:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To comply with a legal obligation.

Purposes for Processing Your Personal Data:

Below is a description of the ways we plan to use your personal data, along with the legal bases we rely on. Note that we may process your personal data for more than one lawful ground depending on the specific purpose:

Purpose/Activity	Type of Data	Lawful Basis for Processing
When you register as a new customer	(i) Identity (ii) Contact	Performance of a contract with you
To process and deliver your order, including managing payments, fees, and charges, and collecting and recovering money owed to us	(i) Identity (ii) Contact (iii) Financial (iv) Transaction (v) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, including notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey	(i) Identity (ii) Contact (iii) Profile (iv) Marketing and Communications	 (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition, or complete a survey	(i) Identity (ii) Contact (iii) Profile (iv) Usage (v) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, and grow our business)
To administer and protect our business and this website, including troubleshooting, data analysis, testing, system	(i) Identity (ii) Contact (iii) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business



Purpose/Activity	Type of Data	Lawful Basis for Processing
maintenance, support, reporting, and hosting of data		reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(i) Identity (ii) Contact (iii) Profile (iv) Usage (v) Marketing and Communications (vi) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business, to inform our marketing strategy, to ensure that we have the information we reasonably require to provide or offer you a relevant product or service, and to help us to provide the best possible service in the most efficient manner)
To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences	(i) Technical (ii) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, to inform our marketing strategy, and to enhance marketing efficiencies for our customers in the sectors in which we operate)
To make suggestions and recommendations to you about goods or services that may be of interest to you and to contact you in connection with potential business opportunities that may be of interest to you	(i) Identity (ii) Contact (iii) Technical (iv) Usage (v) Profile (vi) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business, and to help us to provide the best possible service in the most efficient manner)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing. If you are a corporate subscriber, we may send marketing communications to you where it is in our legitimate interests to do so, and your interests and fundamental rights do not override those interests.

Our websites provide a community platform through which corporate entities who have subscribed can grow their corporate network and reach. For this purpose, we may from time to time share your corporate email address and corporate information with other carefully selected third parties who operate within our community platform and who may be able to help grow or provide value to your and/or that third party's business. Such third parties may contact



you via your corporate email address with business-to-business-related correspondence, which you can opt out of at any time. We will only share your information in accordance with the above where we have determined that it is in our or that third party's legitimate interests to do so, and your interests and fundamental rights do not override those interests, and we ensure appropriate safeguards are in place to protect your personal data. If you wish to object to us sharing your personal data for this purpose, you can do so by emailing us at info@CPShub.com

Notifications

You have control over the types and frequency of email communications you receive from us. You can choose to receive notifications for the following events:

- Creation, update, or posting of tenders
- Submission, review, or rejection of document sets
- Submission or withdrawal of bids
- Acceptance or rejection of invitations
- Issuance, response, or closure of clarification requests
- Addition or deletion of users to the company profile
- Issuance or completion of new transactions

To customize your notification preferences, log into your account, navigate to "My Profile," and select the communications you wish to receive and how often you want to receive them.

We may also send you emails about press releases or blog posts published on our site. You can opt out of these communications at any time by logging into your account and updating your preferences or by using the unsubscribe link at the bottom of each email.

Your Device and Location

When you visit or leave our services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our services from a mobile device, that device will send us data about your location based on your phone settings.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

3. 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 honor 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.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.
- Vendors. We may share your information to our registered vendors on the platform, website or application, where deemed necessary for continuity of business operations and where it is required to exchange business engagements with yourself and the registered vendors for business purpose.
- **Internal Third Parties:** Entities within the CPShub group where it is in our legitimate interests or necessary for the performance of a contract.
 - External Third Parties: Service Providers: Acting as processors, these include providers of IT and system administration services such as but not limited to Salesforce.com, Inc; Amazon Web Services; and other SaaS providers engaged for IT support.
 - Professional Advisers: Including lawyers, bankers, auditors, and insurers who offer consultancy, banking, legal, insurance, and accounting services.
 - Government and Regulatory Authorities: Such as but not limited to Ministry of Economy in UAE, Ministry of Finance, Customs and other regulators requiring reporting of processing activities in specific situations.
 - Corporate Entities: Where we deemed necessary for business continuity and contractual obligations between us and them.
 - Other Third Parties: Where we have received consent to share data.
 - Service Providers: We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, processing transactions, or performing statistical analysis of our services. We only provide these companies with the personal information they need to deliver their services. They are required to maintain the confidentiality of your information and are prohibited from using it for any other purpose.

4. 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.

Industry Networks monitors the pages our customers visit within our digital products to identify the most popular programs, sites, and services. Additionally, we collect information about your computer hardware and software, which may include your IP address, browser type, domain names, and access times. Certain services may be co-branded and offered alongside another company. If you register for or use these co-branded services, both Industry Networks and the partner company may receive the information collected.

Industry Networks uses "cookies" to personalize your online experience. A cookie is a text file placed on your hard drive by a web server. Cookies cannot run programs or deliver viruses to your computer. They are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

The primary purpose of cookies is to provide a convenience feature that saves you time. For instance, if you personalize Industry Networks pages or register with our sites or services, a cookie helps us recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses and preferred email addresses. When you return to Industry Networks, the information you previously provided can be retrieved, allowing you to easily use the features you customized.

You have the option to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline them if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of Industry Networks services or websites you visit.

Clear Gifs (Web Beacons/Web Bugs)

Our third-party tracking utility partner uses a software technology called clear gifs (also known as Web Beacons or Web Bugs) to help us manage content on our site more effectively by providing insights into what content is most engaging. Clear gifs are tiny graphics with a unique identifier, functioning similarly to cookies, and are used to track the online movements of users. Unlike cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages and are approximately the size of a period at the end of this sentence. The information collected by clear gifs is not linked to our customers' personally identifiable information.

Links to Other Sites

This website contains links to other sites that are not owned or controlled by CPShub. Please be aware that CPShub is not responsible for the privacy practices of these other sites. We encourage you to be vigilant when you leave our site and to review the privacy policies of every website that collects personally identifiable information. This privacy policy applies solely to information collected by this website.

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



5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.

Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in different parts of the world and may change from time to time. If you are accessing our Services from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in and other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill 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).

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize 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.



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 _______.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

<u>Withdrawing your consent:</u> 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 by sending us an email on info@CPShub.com or "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.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

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 recognizing and implementing DNT signals has been finalized. 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 us by email at: info@CPShub.com

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 write us through email at: info@CPShub.com



Following documents are linked together and should be read as a whole and single docket that outlines the legal framework that can be found on the website/platform/application:

- 1. Terms of Use
- 2. Privacy Policy
- 3. Cookie Policy
- 4. Disclaimer
- 5. Security Policy

Copyright and Intellectual Property:

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