

# BFB ONE FZ-LLC - Website Privacy Policy

## Introduction

BFB ONE FZ-LLC and its subsidiaries and affiliates (“**we**”, “**our**”, “**us**”) are committed to protecting and respecting your privacy. For the purpose of the General Data Protection Regulation (the “**GDPR**”), BFB ONE FZ-LLC Subsidiaries are the data controller.

This policy sets out the basis on which we will process any personal data or usage information we collect from you, or that you provide to us, in connection with your use of the different BFB ONE FZ-LLC websites that link to this policy (the “**Websites**”). Please read this policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website in question.

## What types of information do we collect and how we use it?

**Information you give us.** You may provide information by contacting us via our Websites, email, telephone or by creating an account in our customer portal.

As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our products and organization, we will use your information to:

- communicate with you via email or telephone;
- administer and provide services and customer support to our customers; or
- enforce our Website terms and conditions.

**Technical usage information.** When you visit the Website, we collect the information sent to us by your computer, mobile phone, or other access device. This information includes:

- your IP address;

- device information including, but not limited to, identifier, name, and type of operating system;
- mobile network information; and
- standard web information, such as your browser type and the pages you access on our Website.

We collect this information in order to:

- personalize our Website to ensure content from the Website is presented in the most effective manner for you and your device;
- monitor and analyze trends, usage and activity in connection with our Website and services to improve the Website;
- administer the Website and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
- keep the Website safe and secure; or
- measure and understand the effectiveness of the content we serve to you and others.

### **Do we use cookies?**

We use cookies to collect information about your browsing activities over time and across different portions of the Website. They allow us to recognize and count the number of users and to see how users move around the Website when they are using it. This helps us to improve the services we provide to you and the way the Website works. You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>

We also use Google Analytics which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all

websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

## **Sensitive Information**

We ask that you not send us, and you not share, any sensitive Personal Information (e.g., government-issued or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

## **How do we share your personal data?**

**Provide Services and Support.** We do not sell, rent or lease your personal information to others except as described in this Privacy Policy. We share your information with selected recipients. These categories of recipients include:

- BFB ONE FZ-LLC-affiliated companies in the United States which store your personal data, to provide for disaster recovery, as well as for the performance of any contract we enter into with you; and
- IT Services providers that provide us with SaaS services, including Salesforce who we use to store our customer relationship management information.

**Comply with Legal Requirements and Corporate Transactions.** BFB ONE FZ-LLC may disclose your Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes; (d) to enforce our terms and conditions; and (e) to allow us to pursue available remedies or limit the damages that we may sustain. Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party.

## **Where do we store your personal data?**

BFB ONE FZ-LLC has operations in countries throughout the world. For users outside of the United States, the information that we collect from you will be transferred to, stored at, and processed in the United States. Your personal data

may also be processed by staff operating outside of your country who work for us or for one of our suppliers. Such staff are engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy.

BFB ONE FZ-LLC has implemented appropriate safeguards for transfers of personal information originating from the European Economic Area (“EEA”) to BFB ONE FZ-LLC affiliates and unaffiliated third parties located outside the EEA.

## **The security of your personal data**

Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal data against loss, theft and unauthorized use, access or modification.

We will, from time to time, host links to and from the websites of our affiliates or third parties. If you follow a link to any of these websites, these websites will have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to those websites.

## **How long do we store your personal data?**

We will retain your Personal Information for as long as our Customer account is active and for a set period afterwards; as needed to provide our Customer products or services; as needed for the purposes outlined in this Policy or at the time of collection; as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements; or to the extent permitted by law. In general, we will retain your Personal Information for a period of seven years after the termination of service to our Customer.

## **Your rights**

In certain circumstances you have rights in relation to the personal data we hold about you. We set out below an outline of those rights and how to exercise those rights. Please note that we will require you to verify your identity before responding to any requests to exercise your rights. To exercise any of your rights,

please email [to@bfb.one](mailto:to@bfb.one). In your request, please make clear what Personal Information you would like to have changed, or whether you would like to have your Personal Information that you have provided to us erased from our database. Please note that for each of the rights below we may have valid legal reasons to refuse your request, in such instances we will let you know if that is the case.

- **Access:** You have the right to know whether we process personal data about you, and if we do, to access data we hold about you and certain information about how we use it and who we share it with.
- **Correction:** You have the right to require us to correct any personal data held about you that is inaccurate and have incomplete data completed.
- **Erasure:** You may request that we erase the personal data we hold about you in the following circumstances: where you believe it is no longer necessary for us to hold the personal data, we are processing it on the basis of your consent and you wish to withdraw your consent, we are processing your data on the basis of our legitimate interest and you object to such processing, you no longer wish us to use your data to send you marketing or you believe we are unlawfully processing your data.). Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure.

## Objection to Marketing

At any time you have the right to object to our processing of data about you in order to send you marketing materials, including where we build profiles for such purposes and we will stop processing the data for that purpose.

## Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [to@bfb.one](mailto:to@bfb.one) and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with regulatory authority in the country in which you live or work where you think we have infringed data protection laws.

## Changes

We may update this policy from time to time. Any changes we will make to this policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy.