



PRIVACY POLICY

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PRIVACY NOTICE

This Privacy Notice for Turaco Legal Consulting FZ-LLC ('we', 'us', or 'our'), describes how and why we might access, collect, store, use, and/or share ('process') your personal information when you use our services ('Services'), including when you:

- Visit our website at <http://www.turacolegal.com>, or any website of ours that links to this Privacy Notice.
- Engage with us in other related ways, including any sales, marketing, or events.

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at Nicole.Gow@TuracoLegal.com.

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 reading further below.

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 below.

Do we process any sensitive personal information? Some of the information may be considered 'special' or 'sensitive' in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.



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

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 below.

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 below.

How do we keep your information safe? We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe below.

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 below.

How do you exercise your rights? The easiest way to exercise your rights is 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 below in full.

PRIVACY NOTICE

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

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



We collect personal information that you voluntarily provide to us when you 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.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Full name, date of birth, age, nationality, marital status, passport, driving licence or other photographic identity details.
- Company, organisation and job title.
- Contact preferences and contact data including physical address, postal address, telephone number and email addresses.
- Payment and/or bank data including credit or debit card details.

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 collected from other sources

In Short: We may collect limited data from public databases, marketing partners and other outside sources.

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

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:

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:



- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent below.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Develop and display personalised and relevant advertising content for our users.
 - Diagnose problems and/or prevent fraudulent activities.
 - Understand how our users use our products and services so we can improve user experience.
 - Develop and display personalize and relevant advertising content for our users.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

4. 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.



5. 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 browser cookies and similar technologies (collectively, “Cookies”) to collect and store certain data when you interact with our website or Services. We may, for example, collect data about the type of device you use to access the website, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, the content you view and features you access on the website, the web pages you view immediately before and after you access the website, whether and how you interact with content available on the website, and the search terms you enter on the website. For data about how we use Cookies and the choices you may have, please see our Cookie Notice below.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

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

Unless specified otherwise in this document, personal information shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on your consent.

Therefore:

- Personal information collected for purposes related to the performance of a contract between the you and us shall be retained until such contract has been fully performed.
- Personal information collected for the purposes of our legitimate interests shall be retained as long as needed to fulfill such purposes. You may find specific information regarding the legitimate interests pursued by us within the relevant sections of this document or by contacting us.

We may be allowed to retain personal information for a longer period whenever you have given consent to such processing, as long as such consent is not withdrawn. Furthermore, we may be obliged to retain personal information for a longer period whenever required to fulfil a legal obligation or upon order of an authority. Once the retention period expires, personal information shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.



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

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. 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 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 Nicole.Gow@TuracoLegal.com.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: Depending on applicable law, you have rights that allow you greater access to and control over your personal information.

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain



a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section HOW CAN YOU CONTACT US ABOUT THIS NOTICE? below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority. If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: 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 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.

If you have questions or comments about your privacy rights, you may email us at Nicole.Gow@TuracoLegal.com.

9. 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 recognising and implementing DNT signals has been finalised. 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.

10. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?



In Short: If you are a resident of, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, 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. More information is provided below.

Categories of Personal Information We Collect

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	NO
B. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	NO
C. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
D. Biometric information	Fingerprints and voiceprints	NO
E. Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
F. Geolocation data	Device location	NO
G. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
H. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO



I. Education Information	Student records and directory information	NO
J. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO
K. Sensitive personal Information		NO

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

Sources of Personal Information

Learn more about the sources of personal information we collect in 'WHAT INFORMATION DO WE COLLECT?'

How We Use and Share Personal Information

Learn more about how we use your personal information in the section, 'HOW DO WE PROCESS YOUR INFORMATION?'

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, 'WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?'

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be 'selling' of your personal information.



We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copy** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling')

How to Exercise Your Rights

To exercise these rights, you can contact us by emailing us at Nicole.Gow@TuracoLegal.com, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorised agent to make a request on your behalf. We may deny a request from an authorised agent that does not submit proof that they have been validly authorised to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us,



we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorised agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

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 email us at Nicole.Gow@TuracoLegal.com or contact us by post at:

Turaco Legal Consulting FZ-LLC
A2-304B, A2 Building
Al Hamra Industrial Zone-FZ
RAK
United Arab Emirates

13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on applicable laws, 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 contact us Nicole.Gow@TuracoLegal.com.



COOKIE NOTICE

This Cookie Notice explains how we use cookies and similar technologies on our website to enable us to analyse use of our services and to improve your experience when using those services. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

COOKIES AND TRACKING TECHNOLOGIES

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

HOW WE USE COOKIES AND TRACKING TECHNOLOGIES

We use cookies, tracking and analytics technologies for several reasons. Some cookies are required for technical reasons in order for our website to operate, and we refer to these as essential cookies. Other cookies enable us to track and target the interest of our users to enhance the user experience. Third parties may serve cookies through our website for advertising, analytics and other purposes.

The specific types of cookies served through our website and the purposes they perform are described below (note that the specific cookies served may vary depending on the specific online properties you access):

i. Essential website Cookies

These cookies are necessary to provide you with services available through our website, for the website to function and to use some of its features. These cookies do not store any personal data.

ii. Performance and Functionality Cookies

These cookies are used to enhance the performance and functionality of our website but are non-essential to their use. However without these cookies, certain functionality may become unavailable.

iii. Analytics and customization cookies



These cookies collect information that is used either in aggregate form to help us understand how our website is being used or how effective our marketing campaigns are, or to help us customize our website for you.

YOUR CHOICES: MANAGING COOKIES AND OPTING OUT

We use cookies to improve your experience on our website. However, your consent is needed for certain cookies before they can be used. You can also choose which cookies you allow us to use, apart from essential cookies, which can't be turned off. You can choose how cookies are handled by your device via your browser settings, including refusing or deleting all cookies. Some devices allow you to control this via your device settings. If you choose not to receive cookies at any time, the website may not function properly and certain services will not be provided. Each browser and device is different, so check the settings menu of the browser or device you are using to learn how to change your advertising settings and cookie preferences.

CONTACT US

If you have any questions or concerns about our use of cookies and other tracking technologies, please contact us via email at Nicole.Gow@TuracoLegal.com.