

SAFIR PRIVACY POLICY

Effective date: October 1st, 2022

1. General Scope

This Privacy Policy describes SAFIR's policies and procedures on the collection, use and disclosure of the Customer's information when the User uses SAFIR's Services; and tells the User about the User's privacy rights and how the law protects the User.

SAFIR uses the User's Personal data to provide and improve the Service. By using the Service, the User agrees to the collection and use of information in accordance with this Privacy Policy.

Please also read the SAFIR Website Terms and Conditions to use SAFIR's Services.

Notice: by using the Website, you as the User agree to be bound by the SAFIR Privacy Policy, which may be amended from time to time at the sole discretion of SAFIR. If you disagree, you must not access or use the Website.

User confirms to have read, understood and accepted all the clauses contained therein.

2. Definitions

In this Privacy Policy, unless the context otherwise so requires, the following expressions have the following meanings:

(The following definitions shall have the same meaning regardless of whether they appear in singular or in plural).

2.1 "Company" (referred to as either "the Company", "We" or "Us" in this Agreement) refers to SAFIR.

2.2 "Cookies" are small files that are placed on the User's computer, mobile device or any other device by a website, containing the details of the User's browsing history on that website, among their many uses.

2.3 "Device" means any equipment that can access the Service, such as a computer, a mobile phone or a digital tablet.

2.4 "Personal Data" is any information that relates to an identified or identifiable individual.

2.5 "SAFIR" shall be understood as the Company operating this Website: SAFIR GROUP INTERNATIONAL LTD. 102 Aarti Chambers, Mont Fleuri, Victoria, Mahe, Seychelles CRN: 234562.

2.6 "Service" refers to SAFIR's Website, its portal and associated Services as defined in the SAFIR's Website Terms and Conditions.

2.7 "Service Provider" means any natural or legal person who processes the data on behalf of the Company. It refers also to any third-party companies or individuals employed by the

Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used. Within the context of the GDPR, Service Providers are considered Data Processors.

2.8 “Usage Data“ refers to 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).

2.9 “User/s” means any visitor of the Website/s.

2.10 “Website/s” means SAFIR any web-addresses or domain names that SAFIR may establish.

3. Collecting the Users’ Personal Data

3.1 Types of Data Collected

3.1.1. Personal Data

While using SAFIR’s Service, We may ask the User to provide Us with certain Personally Identifiable Information (PII) that can be used to contact or identify the User. Personally Identifiable Information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Bank account information in order to pay for products and/or services within the Service
- Usage Data

3.1.2. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as the User’s Device’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of SAFIR’s Service that the User visits, the time and date of the User’s visit, the time spent on those pages, unique Device identifiers, and other diagnostic data.

3.1.3 When the User accesses the Service by or through a mobile Device, We may collect certain information automatically, including, but not limited to, the type of mobile Device the User uses, the User’s mobile Device unique ID, the IP address of the User’s mobile Device, the User’s mobile operating system, the type of mobile Internet browser the User uses, unique Device identifiers, and other diagnostic data.

3.1.4 We may also collect information that the User’s browser sends whenever the User visits SAFIR’s Service, or when the User accesses the Service through a mobile Device.

3.2 Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on SAFIR's Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to analyze and improve SAFIR's Service.

The technologies We use may include:

3.2.1 Cookies or Browser Cookies. A Cookie is a small file placed on the User's Device. The User can instruct the User's browser to refuse all Cookies, or to indicate when a Cookie is being sent. However, if the User does not accept Cookies, the User may not be able to use some parts of SAFIR's Service. Unless the User has adjusted the User's browser setting so that it will refuse Cookies, SAFIR's Service may use Cookies.

3.2.2 Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on the User's personal computer or mobile Device when the User goes offline, while Session Cookies are deleted as soon as the User closes the User's web browser.

We use both Session and Persistent Cookies for the purposes set out below:

3.2.3 Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to providing the User with services available through the Website and to enabling the User to use some of its features. They help to authenticate Users and prevent fraudulent use of User accounts. Without these Cookies, the services that the User has requested cannot be provided, and We only use these Cookies to provide the User with those services.

3.2.4 Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if Users have accepted the use of Cookies on the Website.

3.2.5 Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow Us to remember choices the User makes when the User uses the Website, such as remembering the User's language preference. The purpose of these Cookies is to provide the User with a more personal experience, and to avoid the User having to re-enter the User's preferences every time the User uses the Website.

3.2.6 Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how Users use the Website. The information gathered via these Cookies may directly or indirectly identify the User as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device the User uses to access the Website. We may also use these Cookies to test new pages, features or new functionalities of the Website to see how SAFIR's Users react to them.

3.2.7 Targeting and Advertising Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies track the User's browsing habits to enable Us to show advertising which is more likely to be of interest to the User. These Cookies use information about the User's browsing history to group the User with other Users who have similar interests. Based on that information, and with SAFIR's permission, third-party advertisers can place Cookies to enable them to show adverts which We think will be relevant to the User's interests while the User are on third-party websites.

4. Using the User's Personal Data

4.1 Use of the User's Personal Data

The Company may use Personal Data for the following purposes:

4.1.1 To provide and maintain SAFIR's Service, including monitoring the usage of SAFIR's Service.

4.1.2 To contact the User by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications, regarding updates or informative communications related to the functionalities, products or contracted services, including security updates, when necessary or reasonable for their implementation.

4.1.3 To provide the User with news, special offers and / or general information about other goods, services and events which We offer that are similar to those that the User has already purchased or enquired about, unless the User has opted not to receive such information.

4.1.4 To manage the User's requests and to attend and manage the User's requests to Us.

4.1.5 We may use the User's information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us from SAFIR's Service Users is among the assets transferred.

4.1.6 For other purposes: We may use the User's information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of SAFIR's promotional campaigns, and to evaluate and improve SAFIR's Service, products, marketing and the User's experience.

4.2 We may share the User's personal information in the following situations:

4.2.1 With Service Providers: We may share the User's personal information with Service Providers to monitor and analyze the use of SAFIR's Service, to show advertisements to the User to help support and maintain SAFIR's Service, for payment processing, and/or to contact the User.

4.2.2 For business transfers: We may share or transfer the User's personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of the entirety or a portion of SAFIR's business to another company.

4.2.3 With Affiliates: We may share the User's information with SAFIR's affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include SAFIR's parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

4.2.4 With business partners: We may share the User's information with SAFIR's business partners to allow them to offer the User certain products, services or promotions.

4.2.5 With other Users: when the User shares personal information or otherwise interacts with other Users in the public areas, such information may be visible to all Users and may be publicly distributed outside.

4.2.6 With the User's consent: We may disclose the User's personal information for any other purpose with the User's consent.

5. Retention of the User's Personal Data

5.1 The Company will retain the User's Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use the User's Personal Data to the extent necessary to comply with SAFIR's legal obligations (for example, if we are required to retain the User's data to comply with applicable laws), resolve disputes, and enforce SAFIR's legal agreements and policies.

5.2 The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of SAFIR's Service, or We are legally obligated to retain this data for longer time periods.

6. Transfer of the User's Personal Data

6.1 The User's information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of the User's state, province, country or other governmental jurisdiction, where the data protection laws may differ from those of the User's jurisdiction.

6.2 The User's consent to this Privacy Policy, followed by the User's submission of such information, represents the User's agreement to that transfer.

6.3 The Company will take all reasonably possible steps to ensure that the User's data is treated securely and in accordance with this Privacy Policy, and that no transfer of the User's Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of the User's data and other personal information.

7. Disclosure of the User's Personal Data

7.1 Business Transactions

If the Company is involved in a merger, acquisition or asset sale, the User's Personal Data may be transferred. We will provide notice before the User's Personal Data is transferred and before it becomes subject to a different Privacy Policy.

7.2 Law enforcement

Under certain circumstances, the Company may be required to disclose the User's Personal Data if required to do so by law, or in response to valid requests by public authorities (e.g. a government agency).

7.3 Other legal requirements

The Company may disclose the User's Personal Data in the good faith belief that such action is necessary to:

7.3.1 Comply with a legal obligation

7.3.2 Protect and defend the rights or property of the Company

7.3.3 Prevent or investigate possible wrongdoing in connection with the Service

7.3.4 Protect the personal safety of Users of the Service, or of the public

7.3.5 Protect against legal liability

8. Security of the User's Personal Data

The security of the User's Personal 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 the User's Personal Data, We cannot guarantee its absolute security.

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9. Detailed Information on the Processing of the User's Personal Data

The Service Providers We use may have access to the User's Personal Data. These third-party vendors collect, store, use, process and transfer information about the User's activity on SAFIR's Service in accordance with their Privacy Policies.

We may use, but are not limited to, the following Service Providers and services:

9.1 Analytics

We may use third-party Service providers to monitor and analyze the use of SAFIR's Service.

9.2 Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of SAFIR's Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. The User can opt out of having the User's activity on the Service made available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

9.3 Advertising

We may use Service Providers to show advertisements to the User to help support and maintain SAFIR's Service.

9.4 Google AdSense & DoubleClick Cookie

Google, as a third-party vendor, uses Cookies to serve ads on SAFIR's Service. Google's use of the DoubleClick Cookie enables it and its partners to serve ads to SAFIR's users based on their visit to SAFIR's Service or other websites on the Internet.

The User may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>

9.5 Email Marketing

We may use the User's Personal Data to contact the User with newsletters, marketing or promotional materials and other information that may be of interest to the User. The User may opt out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send, or by contacting Us.

We may use Email Marketing Service Providers to manage and send emails to the User.

10. GDPR Privacy

10.1 Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

10.1.1 Consent: The User has given consent for the processing of the User's Personal Data for one or more specific purposes.

10.1.2 Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof.

10.1.3 Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.

10.1.4 Vital interests: Processing Personal Data is necessary in order to protect the User's vital interests, or those of another natural person.

10.1.5 Public interests: Processing Personal Data is related to a task that is carried out in the public interest, or in the exercise of official authority vested in the Company.

10.1.6 Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

10.1.7 In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

10.2 The User's Rights under GDPR

The Company undertakes to respect the confidentiality of the User's Personal Data and to guarantee that the User can exercise the User's rights.

The User has the right under this Privacy Policy, and by law if the User is within the EU, to:

10.2.1 Request access to the User's Personal Data. The right to access, update or delete the information We have on the User. Whenever made possible, the User can access, update or request deletion of the User's Personal Data directly within the User's account settings

section. If the User is unable to perform these actions, the User shall contact Us to assist. This also enables the User to receive a copy of the Personal Data We hold about the User.

10.2.2 Request correction of the Personal Data that We hold about the User. The User has the right to have any incomplete or inaccurate information We hold about the User corrected.

10.2.3 Object to processing of the User's Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for SAFIR's processing, and there is something about the User's particular situation which makes the User want to object to SAFIR's processing of the User's Personal Data on this ground. The User also has the right to object where We are processing the User's Personal Data for direct marketing purposes.

10.2.4 Request erasure of the User's Personal Data. The User has the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.

10.2.5 Request the transfer of the User's Personal Data. We will provide the User, or a third-party the User has chosen, with the User's Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which the User initially provided consent for Us to use or where We used the information to perform a contract with the User.

10.2.6 Withdraw the User's consent. The User has the right to withdraw the User's consent on using the User's Personal Data. If the User withdraws the User's consent, We may not be able to provide the User with access to certain specific functionalities of the Service.

10.3 Exercising of the User's GDPR Data Protection Rights

10.3.1 The User may exercise the User's rights of access, rectification, cancellation and opposition by contacting Us. Please note that we may ask the User to verify the User's identity before responding to such requests. If the User makes a request, SAFIR will try its best to respond to the User as soon as possible.

10.3.2 The User has the right to complain to a Data Protection Authority about SAFIR's collection and use of the User's Personal Data. For more information, if the User is in the European Economic Area (EEA), please contact the User's local data protection authority in the EEA.

11. Children's Privacy

SAFIR's Service does not address anyone under the age of 18. We do not knowingly collect Personally Identifiable Information from anyone under the age of 18. If the User is a parent or guardian and the User is aware that the User's child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from SAFIR's servers.

If We need to rely on consent as a legal basis for processing the User's information and the User's country requires consent from a parent, We may require the User's parent's consent before We collect and use that information.

12. Links to Other Websites

SAFIR's Service may contain links to other websites that are not operated by Us. If the User clicks on a third-party link, the User will be directed to that third-party's site. We strongly advise the User to review the Privacy Policy of every site the User visits.

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

13. Changes to this Privacy Policy

We may update SAFIR's Privacy Policy from time to time. We will notify the User of any changes by posting the new Privacy Policy on this page. We will let the User know by updating the "Last updated" date at the top of this Privacy Policy.

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

14. Contact Us

All enquiries regarding this Privacy Policy may be directed via email to support@safir.com