

# PRIVACY POLICY

## OUR COMMITMENT TO YOU

Urbanconnection.co (“**Urban Connection**”) is dedicated to providing internet users with the highest level of transparency and control over the use of their data. In order for us to provide you with our services we are required to collect and process certain personal information about you and your activity.

By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this Information.

We encourage you to review the following information carefully.

## GROUNDS FOR DATA COLLECTION

Processing of your “**Personal Data**” (meaning any information which may potentially allow your identification with reasonable means) is necessary for the performance of our contractual obligations towards you and providing you with our services and the operation of our website (hereinafter the “**Services**” and “**Website**”), to protect our legitimate interests and for compliance with legal and regulatory obligations to which we are subject.

When you use our Service, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

## HOW DO WE RECEIVE DATA ABOUT YOU?

We receive your Personal Data from various sources:

Registration information – When you voluntarily provide us your personal details in order to create an Urban Connection a account or register to our Service (for example, your name and email address);

When you communicate with us – For example when you send us an email, we collect the Personal Information you provided us with.

Technical information – When operating our services, we use various technological tracking tools to collect information regarding your use of the Website. Along with our partners, we may use tracking technologies such as cookies, JavaScript, beacons and Local Storage such as HTML5, which are

used to store content information and preferences. You can learn more about the tracking tools we use by visiting our

Third party information – We may receive your data from third party providers who help us with the provision and maintenance of our Services, such as traffic analytics vendors, fraud prevention agencies and others.

## WHAT TYPE OF DATA WE COLLECT?

### Personal Data

In the course of using the Service, we may ask you to provide us with certain Personal Data to provide and improve the Service, to contact or identify you, to enable you to access certain parts of the Website, and as otherwise indicated in this Policy. We collect the following Personal Data about you:

**Registration information** – your name, your mailing address, your email address, telephone number, and similar contact details.

**When using our Website** – our webserver will collect your IP-address, and information about your general location (such as city and country).

### Non-Personal Data

We also collect data about the use of our Service and the characteristics and activities of users, in order to operate it and improve it. We may collect the following non-Personal Data:

**Technical information** – this category includes data such as website visits, the browser you are using and its display settings, your operating system, device type, session start/stop time, time zone, network connection type (e.g., Wi-Fi, cellular), and cookie information.

**Information from third parties** – this category includes information we receive from our business partners. This may include pseudonymous advertiser identifiers that some Advertisers or other third party ad platforms choose to share with us. This information is also used to enhance data points about a particular unique browser or device.

If we combine Personal Data with non-Personal Data, the combined data will be treated as Personal Data. Further Personal Data will only be stored and processed if you voluntarily provide it to us, e.g. through a contact form.

## TRACKING TECHNOLOGIES

When you visit or access our Services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies. Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Services, improve our Website's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected

through these tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Data. To learn more about our Tracking Technologies please visit our [page](#).

## HOW DO WE USE THE DATA WE COLLECT?

**Provision of service** – for the provision and improvement of our Services, including for support and to respond to your queries.

**Service announcements** – we will use your Personal Data to communicate with you and to keep you informed of our latest updates to our Services and offer you service offers.

**Marketing purposes** – we may use your Personal Data (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Data, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us.

**Opt-out of receiving marketing materials** – If you do not want us to use or share your Personal Data for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your Personal Data with third parties for non-marketing purposes (for example to fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your Personal Data are authorized to use your Personal Data only as necessary to provide these non-marketing services.

**Analytics, surveys and research** – from time to time, we may conduct surveys or test features, and analyze the data we have to develop, evaluate and improve these features, all in order to improve our Service and think of new and exciting features for our users.

**Protecting our interests** – we may use your Personal Data when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of Urban Connection , its users and/or partners.

**Enforcing of policies** – we may use your Personal Data in order to enforce our policies, including but not limited to our Terms .

**Compliance with legal and regulatory requirements** – we may use your Personal Data to investigate violations, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

# WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

**Internal concerned parties** – we share your information with companies in our group, as well as our employees, in order to provide you with our services.

**Business partners** – we share your information with business partners, such as storage and analytics providers who help us provide you with our service. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.

**Compliance with laws and law enforcement entities** – we cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

**Merger and acquisitions** – we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.

## TRANSFER OF DATA OUTSIDE THE EEA

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

## HOW WE PROTECT YOUR INFORMATION

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. Your data is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners on a "need to know" basis, in order to enable the carrying out of the agreement between us.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account. You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use. You should also be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the service, and you do so at your own risk.

## **RETENTION**

We will retain your Personal Data for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

## **USER RIGHTS**

You may request to:

- Receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary information.

- Receive a copy of Personal Data you directly volunteer to us in a structured, commonly used and machine-readable format.

- Request rectification of your Personal Data that is in our control.

- Request erasure of your Personal Data.

- Object to the processing of Personal Data by us.

- Request to restrict processing of your Personal Data by us.

- Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

## **HOW TO CONTACT US?**

If you wish to exercise any of the aforementioned rights, or receive more information, please contact our Data Protection Officer (“DPO”) using the details provided below [privacy@urbanconnection.co](mailto:privacy@urbanconnection.co)

## **OUR POLICY TOWARD CHILDREN**

We understand the importance of protecting children’s privacy, especially in an online environment. The Site and Services are not designed for or directed at children under the age of 16 years old (“**Minors**”). We do not knowingly collect Personal Data from Minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Data, he or she should contact us using the details provided above.

## **UPDATES TO THIS POLICY**

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the “Last Updated” heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Privacy Policy.