

# Atom Global Privacy Policy

LAST UPDATED 1st May 2024

## 1. Foreword

Thank you for visiting <https://atomglobal.ae/> (“**Website**”). The Website is owned and operated by ATOM GLOBAL COMMERCIAL ENTERPRISES - FZCO, registration No. DSO-FZCO-36240, having its registered address at IFZA Business Park, DDP Premises Number 38341 -001, Makani Number A1 - 3641379065, Dubai, United Arab Emirates (“**we**,” “**us**” or “**Atom Global**”).

We respect your privacy and are committed to providing a secure environment to users of our Website (“**you**” or “**User**”). This privacy policy (“**Policy**”) is intended to provide you with important information about how and why your data may be collected and processed by Atom Global. All Personal Data (defined below) will be processed pursuant to applicable law.

## 2. Data Collected and Purposes

We collect and process a limited amount of Personal Data for specific purposes, such as allowing you to communicate with us, improving your experience. Whenever we collect your Personal Data, and for whatever purposes, we are committed to always collecting the minimum amount of Data that is necessary for the relevant purpose.

This section provides more information regarding what Personal Data we collect, what we process that Personal Data for and the legal basis for each specific processing purpose.

- **Website Use.** Atom Global collects and processes some Data in order to understand how Users actually interact with the Website and improve User experience. This Data consists of various browsing information derived from Cookies or technical mobile identifiers, some of which may include Personal Data.
  - The legal basis of this processing depends on your location and the applicable law. In countries where the use of cookies is conditioned on the Users’ prior consent, Atom Global processes this Data on the basis of your consent. In other countries, Atom Global processes this Data on the basis of (i) its legitimate interest, including understanding the way Website are used by Users; and improving the Website if needed, or (ii) your consent, depending on the purpose of the cookie.
- **User Requests and Communication.** Atom Global collects and processes Personal Data, such as your e-mail and the content of your message (to the extent such content is considered Personal Data) when managing and following up on any questions and/or requests you may submit to us.

- The legal basis for such processing is contractual. User requests and communication with them are an integral part of the services we provide, so we need this data to fulfill our obligations to you.

#### 4. Data Retention

- **Website Use.** Personal Data processed by or on behalf of Atom Global for the purposes of analytics or other study or analysis will not be retained by Atom Global after such studies have been completed and the relevant reports, outputs and/or insights have been produced.
- **User Requests and Communication.** For management of your questions and/or requests, Atom Global will retain your Personal Data for a maximum of three (3) years after the last time you reached out to us.

Notwithstanding the above, Atom Global may store some Personal Data for a longer duration pursuant to its legitimate interests and applicable legal obligations. When the relevant retention period expires, Atom Global will delete your Personal Data or apply adapted measures to the relevant data to ensure that you can no longer be identified. If Atom Global concludes that it is not necessary to keep your Personal Data in its active database, it will archive the relevant Data. For all active and archived Data, Atom Global will ensure that access to the relevant Data is restricted to a limited number of persons with a genuine need to access it.

#### 5. Processors and Data Transfer

Atom Global may use Third-Party Service providers and other third parties (“Processors”) to facilitate, maintain, improve, analyze, and secure the Website. Processors may have access to Personal Data for the sole and exclusive purpose of carrying out the processing activity assigned to the relevant Processor by Atom Global. Atom Global ensures that the service providers have sufficient guarantees for the performance of the processing activity and comply with the applicable laws and regulations.

#### 6. Data Sharing

The Company shares your Personal Data with Third-Party Service providers and suppliers which assist the Company for fulfilling the purposes specified in this Policy.

#### Third-Party Services

- Some content or features of the Website are provided by Third-Party Service providers. In order to facilitate your access to such content and/or features, Atom Global may share some of your Personal Data with Third-Party Services and suppliers. The Third-Party Service may ask you for additional Data. Whether or not integrated into the Website, these Third-Party Services collect and process any Data they receive pursuant to their relevant privacy policy, in that provider’s sole responsibility.
- Please note that the contractual arrangements between Atom Global and our Third-Party Service Providers specify that both Atom Global and the Third-Party Service Provider will act as an “independent controller” as defined by the

GDPR (or “Business” as defined by the CCPA) and must comply with all applicable data protection laws and regulations. Please consult the relevant privacy policy of the relevant Third-Party Service for more information.

### **Judicial and Governmental Authorities**

- Where required by law or valid court order and to the extent legally permitted, Atom Global may share your Personal Data with competent courts and/or any other governmental and/or public authorities requesting access to your Personal Data.

We take sharing your Data seriously. Whenever we share your Personal Data with any of the above recipients, we do so on a strictly need-to-know basis and only as necessary for fulfilling identified processing purposes.

### **7. Use by Children**

The Website are intended for use by individuals eighteen (18) years old or older. The Website are not available for Users under 18 years old.

### **8. Your Rights**

Most applicable data privacy laws have granted individuals rights in connection with their Data and how that Data is processed. The below section is intended to inform you of your rights in connection with your Personal Data.

You have the right to access your Personal Data, correct it, move it, delete it and a right to restrict how your Data is processed. You also the right to specify instructions defining the way Personal Data shall be managed after your death.

### **Requests**

- To exercise your rights or make an enquiry regarding data privacy at Atom Global, you should make a request accompanied by proof of identity by email at [info@atomglobal.io](mailto:info@atomglobal.io)
- Atom Global will attempt to answer your request or enquiry as soon as possible, and at the latest within one (1) month of receipt of the request. For complex requests, we reserve the right to extend this period to three (3) months.

### **9. Cookies**

- When you browse our Website, cookies are placed on your terminal, either directly or after having obtained your consent when required by the regulations on cookies.
- Cookies are pieces of information placed on the Internet user's terminal equipment by the server of the website visited. They are used by a website to send information to the Internet user's browser and to allow this browser to send information back to the website of origin (for example, a session identifier or the choice of a language).
- Only the sender of a cookie can read or modify the information contained in it.

- There are different types of cookies:
  - session cookies that disappear as soon as you leave the Website;
  - permanent cookies that remain on your terminal until their lifetime expires or until you delete them using your browser's functions.
- You are informed that, during your visits to the Website, cookies may be installed on your terminal equipment.
- Some cookies are essential to the use of the Website: these are technical cookies used by the Website host for the technical management of the network.
- Others are used to analyze the frequentation and the use made of the Website, in order:
  - to make it evolve in the sense of an improvement of the experience of navigation, in the final objective to propose you a Website always more adapted; to conduct studies;
  - to memorize your browser's display preferences (language used, display parameters, operating system used, etc.) and to adapt the presentation of the Website to the time of your visits, according to the hardware and software of visualization or reading that your terminal equipment includes and which are used for navigation on our Website;
  - to implement security measures.

## **10. Security**

Atom Global has implemented and maintains measures to protect the confidentiality, security, and integrity of your Personal Data against unauthorized access and disclosure, modification, alteration, damage, accidental loss or accidental or illicit destruction, as well as against any other form of unauthorized processing or disclosure.

## **11. Updates to this Privacy Policy**

Atom Global reserves the right to change this Policy as necessary, as the Website evolves or as required by applicable laws. Any material Policy changes will be communicated to you. When using the Website, you are deemed to have accepted the terms of the Policy, as published on our Website.