

Date: 15th May 2018

Privacy Statement – GDPR

Introduction

All references to 'our', 'us', 'we' or 'company' within this policy and within the opt-in notice are deemed to refer to OPTIMAL CONNECTIVITY LLC, its potential subsidiaries, distributors, affiliates and other related companies and any of their businesses.

We endeavor to protect your personal privacy. We provide this Privacy Statement to help you to understand what we may do with any information that we obtain from you. By providing your personal details to us, you signify your acceptance of our Privacy Statement. If you do not agree to this statement, please do not provide your personal details to us. This Privacy Statement is incorporated into, and forms part of the Terms & Conditions which govern your use of our Site. We will use your information for the purposes set out below. You will have an opportunity to unsubscribe whenever we communicate with you. To unsubscribe from our market communication please send an email to info.me@oc2me.com.

We may need to update this Privacy Statement from time to time. We recommend that you regularly check this page to ensure that you have read the most recent version. For your convenience you may [download these terms via PDF](#).

Collecting Personal Information

You can decide what personal information you provide to us. We will only collect personal information that you choose to provide. Where possible, we will enable you to select how we will use this information.

You may choose to provide us with personal information if, for example, you: contact us with an enquiry; register on the site, fill out a survey or other form with your personal information included; request us to provide you with information; enter a competition; post information to public areas of the site or take advantage of a promotion.

You have the opportunity to choose not to receive communications from us at any point where we request information about you.

By providing any personal information to us, you fully understand and clearly consent to the transfer of such personal information to, and the collection and processing of such information in, other countries or territories. Any such transfer disclosure and processing by us will be in accordance with this Privacy Statement.

Third parties (including but not limited to software providers, advertisers and ad placement agencies) may also use tracking technologies by or through the Site. We have no responsibility or liability for any tracking, data collection or other activities of such third parties.

Our Use of Cookies

In common with many websites, we use "cookies" to help us gather information from visitors to our site about you which is not personally identifiable such as:

- the IP address from which you access the site
- the type of browser and operating system used to access the site
- the date and time of your access to the site
- the pages you visit
- the pages you visit the internet address of the website from which you accessed the site

A cookie is a small data file that our server sends to your browser when you visit the site. The use of cookies helps us to assist your use of certain aspects of the site. You can delete cookies at any time or you can set your browser to reject or disable cookies. If you do disable cookies some functions on the site may not work correctly. You can obtain information about how to manage cookies at www.allaboutcookies.org.

We use information from cookies, for example, to learn about the number of visitors to our site and the type of technology that our visitors use. Cookies help us to monitor what sort of content is popular and to assess visitors browsing habits. When a user revisits the site, we may recognise the user by the cookie and customise the user's experience accordingly. We can use this information to continually improve the content and usability of the site.

We may compile and report to third parties (such as advertisers) aggregate statistics about our users in terms of numbers, traffic patterns and related site information. When you visit our Site we automatically collect and store certain non-personal information about you such as:

- the IP address from which you access the site
- the type of browser and operating system used to access the site
- the date and time of your access to the site
- the pages you visit
- the internet address of the website from which you accessed the site

Use of Information

We may use personal and non-personal information collected from you in the following ways:

Internal Marketing purposes

We may use information for internal marketing analysis, for example, to assess trends among our consumers or to measure the amount of traffic to our websites. We may also use your personal information in order to communicate with you about our products and services and those of our subsidiaries, affiliates, and related companies and any of their businesses. Some or all of these activities may be sub-contracted to third parties who will agree to be bound by the terms of this privacy policy. However, you will be able to choose whether or not to receive such communications when you first provide personal information to us. You will have an opportunity to unsubscribe whenever we communicate with you. To unsubscribe from our please send an email to us. We may also share non-personal information with others, such as advertisers, in aggregate anonymous form, which means that the information will not contain any personally identifiable information about you.

Transactional purposes

We may use your personal information in order to respond to your queries and requests and to manage transactions such as credit card payments for any goods that you order from us or any of our agents, or for the fulfilment of such transactions (e.g. delivery). The personal information you provide may be used by an authorised vendor to fulfil that order.

Third party offers

We may arrange for carefully selected organisations to send you marketing and promotional information that may be of interest to you. In such circumstances your personal information may be disclosed to these organisations who will agree to be bound by the terms of this Privacy Statement. We will obtain your permission before you are sent any such communications.

Sale and Transfer

In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including without limitation, personally identifiable information that you provide and other information concerning your relationship with us.

Administration and Data Management

We may disclose your personal information to third parties under confidentiality obligations when the performance of any service in relation to the activities above is sub-contracted (e.g. the administration of a marketing campaign).

Legal purposes

We may disclose your personal information if permitted by law or required to do so by law or where we believe such action is necessary in order to protect or defend our interests or the interests of our customers or users of our Site.

Security

We take security seriously and we take precautions to keep your personal information secure. We have put in place appropriate physical, electronic and managerial procedures to safeguard the information we collect. However, due to the open communication nature of the Internet, we cannot guarantee that communications between you and us, or information stored on our servers, will be free from unauthorised access by third parties.

Access to your Information

At your request, where the law requires us to do so, we will confirm what personal information we hold about you, update your information, remove your information and/or correct any inaccuracies in such personal information if you contact us. We will make every effort to respond to your request in a timely manner.

Links

This site may contain links or references to other Web sites outside of our control. Please be aware that we have no control over these sites and our privacy statement does not apply to these sites. We encourage you to read the privacy statements and terms and conditions of linked or referenced sites you enter.

GDPR Compliance

OPTIMAL CONNECTIVITY believes that your personal data belongs to you. We aim to respect and process your personal data with due care at all times. When visiting our websites, you shall feel confident that your privacy is respected.

The purpose of this policy is to inform you of the types of Personal Data we collect when you use one of the OPTIMAL CONNECTIVITY web sites and the steps we take to protect and safeguard your personal information. This policy and its principles apply to personal identifiable information we ask for and that you provide. By this we mean information that directly or indirectly identifies you, such as your name, physical address, e-mail address, IP number or other contact details.

We aim to process personal data that is adequate, relevant and not excessive in relation to the purpose for which it has been collected. We believe in being transparent about the types of personal information and why we collect your information. We only collect and process personal information where we have lawful grounds to do so, and in accordance with Data Privacy Laws.

On request, OPTIMAL CONNECTIVITY will provide you with further information regarding our processing and protection of your personal data when visiting our websites or communicating with us through other channels. Please see the contact section below.

Personal Data collection

We hope the following information will help you make an informed decision about sharing your personal information with us. You are always free to decide if you want to provide your personal identifiable information or not.

Just visiting our website

By accessing and browsing our web sites and most other services, we do not require personal identifiable information. We may collect limited non-personal identifying information your browser makes available whenever you visit a website. For example, your Internet Protocol address, browser language, geographical location data, date and time, and cookies. We use non-personal information to better understand user experience and interaction with the sites and to further improve our offerings and services. Our Policy for usage of cookies is available here: www.oc2me.com/legal/cookies-policy

Creating an Account

We also provide services which require you to register a personal account. To register an account, we need certain personal identifiable information which we use to create the account and to provide the services you requested. This personal identifiable information will only be used for the specific purpose it was collected for.

Applying for a Job online

Whenever we request personal identifiable information, we will inform you about what types of data we collect and how we use it. In general, if you are applying for job online we will use your information to process your application.

Connect for Business

Where you request to receive newsletters, marketing and promotional material, general information or connect with us online, we may (depending on type of contact you request) collect the following personal identifiable information, for example:

Contact details (e-mail, address, phone, professional title or role), company name, gender and language preferences;

Event, meeting (including feedback about content and services at events you attend through surveys), travel Information;

Where connecting on social platforms, we may also collect information you submit or post to and from our Services.

We may also collect your precise, real-time location using beacon technology, GPS, cell phone towers, Wi-Fi signals, and/or future technologies.

We might look at how often you use an app and where you downloaded it.

We may also collect information from business partners, from third parties acting on your behalf, and other platforms that help provide Services. For example, we may receive meeting data from an event registration provider.

We use your personal identifiable information to provide you with the requested services and may send you marketing and promotional material relevant to you, including invites to events and seminars, product and service offerings, to keep in contact and to provide you with news, updates and other business-to-business related information relevant to you.

You may at any time ask us to delete your personal identifiable information. Please contact info.me@oc2me.com

OPTIMAL CONNECTIVITY is responsible as controller OPTIMAL CONNECTIVITY is responsible as controller OPTIMAL CONNECTIVITY LLC, headquartered in Dubai, UAE, is the data controller of personal information

collected via our website and which you entrust to us. We always aim to comply with the General Data Privacy Regulation and other applicable Data privacy laws. If you have any complaints relating to our handling of your personal identifiable information that cannot be resolved with us directly, please contact the UAE Data Protection Authority.

Legal grounds for Collection and Processing of Personal Data

Depending on what services you request from us, we only process your personal identifiable information where we have legal grounds to do so. Where we require your consent to collect and process your personal data, the request form will be provided in a clear, specific and expressly manner.

If we have asked for your consent, it can always be revoked at any time by contacting us and we will not use or process your personal identifiable information any more.

Sharing of information

As a general rule, OPTIMAL CONNECTIVITY never rents or sells your personal identifiable information to other companies or individuals, unless we have your consent. We may share such information in any of the following limited circumstances:

With your consent.

To trusted businesses or persons for the sole purpose of processing your request on our behalf. Where this occurs, such parties are subject to agreements which require them to process such information only on our instructions and in compliance with this Privacy Policy and appropriate confidentiality and security measures.

Where we are required by law or have good faith to believe that access, preservation or disclosure of such information is reasonably necessary to protect the rights, property or safety of OPTIMAL CONNECTIVITY, its users or the public.

We may store and process personal information collected on our site in any country in which OPTIMAL CONNECTIVITY or our hosting providers maintain facilities. By using our services, you consent to the transfer of your information among these facilities, including those located outside your country.

Sharing of Account-specific information

When you have created an account with us we may share information submitted under your account among all our services as well as distributors and channel partners to provide you with a seamless experience and to improve the quality of our services. We will not disclose your account information to other people or non-affiliated companies, except in the limited circumstances described in this Policy or with your consent.

We only share your Information with data platforms and cloud providers that perform services on our behalf. We share Information with companies that help us operate and support our Services. Some vendors may be located in a country other than where you live. We may also share Information with analytics and search engine providers who act on our behalf.

Security Measures

We aim to implement appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data.

We restrict access to your personal data to our employees and suppliers who need to use the information in order to process it on our behalf, and who are contractually required to keep your personal data secure and confidential.

Updating your information

Where we process your personal data, we aim to ensure that it is accurate and up-to-date. We will seek to erase or rectify personal data that is inaccurate or incomplete. If you need to update or correct your personal identifiable information, please contact dataprivacy@oc2me.com with your request and we will provide you with the mechanism for updating and correcting your personal identifiable information.

Retention

We will only retain your personal data for as long as it is necessary to fulfil the purposes outlined in this policy or the purposes of which you have otherwise been informed. We will retain your data for as long as permitted under applicable legal grounds, after which it will be deleted.

If our legal grounds rely on your consent, you may revoke your consent at any time. Where you have exercised your right to withdraw your consent we may be required to keep your personal identifiable information for defined

period in order for us to meet our legal obligations and defend ourselves in legal disputes under certain circumstances.

Links to third party sites

Services may include links to other websites whose privacy practices differ from ours. These external sites may place their own cookies on your computer, collect data or solicit personal information. If you submit Personal Information to any of those sites, your Information is governed by their privacy policies. OPTIMAL CONNECTIVITY does not exercise any control, or assume any responsibility for these sites, and we encourage you to carefully read the privacy policy of any website you visit.

Your Rights as an individual under this Policy

Since we process your Personal Data you can exercise certain rights during specific circumstances. In relation to your Personal data you may request to:

- Access your Personal Data (data subject access request)
- Rectify your Personal Data
- Erase your Personal Data
- Restrict the processing of your Personal Data
- Object to the processing of your Personal Data

All requests must be made in writing and be signed by you, and include information on name, address and, preferably, your e-mail address to verify your identity. Where the applicable law provides for an administrative fee for complying with such a request (including frivolous or excessive requests) such a fee may be charged by OPTIMAL CONNECTIVITY.

All valid requests will be dealt with in a prompt and proper manner and we will respond within no less than 30 days upon receiving your request.

To make your request, please contact info.me@oc2me.com

If your request has been denied for the stated reasons, you may file a complaint to the local data protection authorities in the jurisdiction of the office in which the services are being provided.

Changes to this Notice

OPTIMAL CONNECTIVITY reserves the right to amend this policy from time to time. We expect most such changes to be minor, but there may be changes that are more significant. The date of the last modification is stated at the end of this document.

We will post those changes on this page and we will also provide a more prominent notice if the changes are significant. Each version will be noted at the top of the page. Prior versions of this Privacy Policy will be kept in an archive to view.

Contact

If you have any additional questions or wish to exercise your rights, please feel free to contact us any time at info.me@oc2me.com

Version

This policy was published on 19th May 2018