

# PRIVACY AND COOKIES POLICY

**Last Updated: January 2026**

**Entity: Connect Marketing FZE** (“Connect,” “we,” “our,” or “us”)

## 1. Introduction

This **Privacy and Cookies Policy (“Policy”)** applies to all visitors and Users of the Connect Platform and forms an integral part of the **Connect Terms & Conditions**.

By accessing or using the Platform, you consent to the collection, processing, storage, transfer, and use of your Personal Data as described in this Policy. If you do not agree, you must discontinue use of the Platform.

For purposes of this Policy, “**Personal Data**” means any information that identifies or can reasonably identify an individual or legal entity, including sensitive, technical, or financial information.

## 2. Purpose of This Policy

Connect is committed to safeguarding your privacy and protecting your Personal Data. This Policy explains:

- What information we collect
- How we store and protect it
- How we use it
- How we share it
- Your data protection rights

## 3. Consent

By using our Platform, registering an account, or submitting any Personal Data, you acknowledge and accept this, Policy. You may withdraw consent at any time, but doing so may limit your ability to use certain Services.

## 4. Information We Collect

We may collect and store different categories of information, including:

### 4.1 Personal Identification Data

- Full name
- Date of birth
- Gender and nationality
- Email address and phone number

### 4.2 Technical & Account Data

- Login credentials
- IP address
- Browser type and device information
- Operating system, time zone, and platform
- Usage history (pages visited, clicks, session duration)

### 4.3 Transaction & Activity Data

- Wallet addresses
- Transaction information
- Referral activity (for EMPs)

## 5. If You Fail to Provide Data

If required Personal Data is not provided, we may not be able to:

- Create or maintain your account

- Offer certain Services
- Comply with legal or verification requirements

In such cases, we may suspend or restrict access to the Platform.

## 6. How We Use Your Personal Data

We use your Personal Data in accordance with applicable laws. Uses include:

- Delivering and improving the Platform and Services
- Supporting EMP referral activities
- Identity verification, fraud prevention & compliance
- Customer service and communication
- Legal and regulatory obligations
- Marketing communications (where permitted)
- Analytics, personalization, and product development

## 7. Legal Basis for Processing

We process Personal Data under the following legal bases:

- **Performance of a contract** (to provide Services to you)
- **Legitimate interests** (to improve Platform functionality and security)
- **Legal obligation** (KYC, AML, regulatory requirements)
- **Your consent** (where expressly required by law)

## 8. Change of Purpose

We will only use your data for the purposes it was collected for, unless:

- We reasonably determine it is needed for a compatible purpose, or
- We obtain your consent for a new use

We may process your data without notice where required by law.

## 9. Sharing and Transfers of Data

We may share Personal Data with carefully selected third parties, including:

- Product Partners & Service Partners
- Subcontractors and technical service providers
- KYC/AML verification vendors
- Hosting and infrastructure providers
- Customer support and analytics providers
- Regulators or government authorities

We share only the minimum data necessary and only with partners meeting high data protection standards.

By accepting this Policy, you consent to such third-party sub processors collecting and processing Personal Data on our behalf.

## 10. Data Security and Storage

We use administrative, technical, and physical safeguards, including:

- Encryption
- Firewalls
- Secure authentication

- Access controls

However, no online platform is fully secure. Data sent via email, phone, or SMS is not guaranteed secure until received by us.

## 11. Data Retention

We retain Personal Data:

- **Up to five (5) years** after your relationship with Connect ends, or longer if required by law
- Cookies & analytics data: **up to one (1) year**
- Compliance-related records: as required by KYC/AML regulations

## 12. Your Rights

Depending on your jurisdiction (including GDPR regions), you may have the right to:

- **Access** your data
- **Correct** inaccurate information
- **Erase** your data (subject to legal obligations)
- **Restrict** or **object** to certain uses
- **Port** your data to another provider
- **Withdraw consent** at any time

If you wish to exercise your rights, contact [support@connect.ac](mailto:support@connect.ac).

For EU residents: Connect complies with applicable GDPR requirements for any transfer of Personal Data outside the EEA.

## 13. Cookies Policy

Cookies are small text files stored on your device. We use:

- **Essential Cookies** (cannot be disabled)
- **Session Cookies**
- **Persistent Cookies**
- **First-party Cookies**
- **Third-party Cookies** (analytics, marketing)
- **Performance Cookies**
- **Functionality Cookies**
- **Marketing Cookies**

You may manage or block cookies in your browser settings but disabling essential cookies may limit Platform functionality.

## 14. Third-Party Links

The Platform may include links to third-party websites. Connect is not responsible for:

- Their privacy policies
- Their security practices
- The use of your Personal Data

We encourage Users to read each website's Privacy Policy.

## 15. Updates to This Policy

Connect may update or amend this Policy at any time. The "Last Updated" date will reflect the latest version. Continued use of the Platform constitutes acceptance of changes.

Please keep your Personal Data up to date to ensure accurate communication and compliance.

## 16. Contact Information

If you have any questions or concerns regarding this Policy:

 [support@connect.ac](mailto:support@connect.ac)

### Company Details

#### **Connect Marketing FZE**

Business Center, Sharjah Publishing City Free Zone,  
Sharjah, United Arab Emirates

## 17. EU Supervisory Authority Rights

If you reside in the European Union and believe your concern has not been adequately addressed, you may contact your local Data Protection Authority. However, Connect welcomes the opportunity to resolve issues directly first.