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PRIVACY & COOKIE POLICY

CONNECT Marketing FZE

Last Updated: January 2026

IMPORTANT NOTICE

This Privacy & Cookie Policy ("Policy") explains how CONNECT Marketing FZE ("CONNECT," "Company," "we," "our," or "us") collects, stores, processes, shares, transfers, protects, and manages personal information and cookie-related technologies across the CONNECT ecosystem, including websites, software systems, educational environments, marketplaces, community systems, referral systems, applications, and related digital services (collectively the "Platform" or "Services").

This Policy forms an integral part of the CONNECT Terms & Conditions.

By accessing or using the Platform, Users acknowledge and agree to the practices described within this Policy.

If you do not agree with this Policy, you should discontinue use of the Platform and Services.

1. COMPANY INFORMATION

Legal Entity

CONNECT Marketing FZE

Registered Jurisdiction

Sharjah Publishing City Free Zone
United Arab Emirates

Operational Activities May Include

- E-commerce activities;
- digital marketing services;
- software-access services;
- online marketplace functionality;
- educational-access systems;
- community and networking environments;
- customer-acquisition services;

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- social-networking functionality;
- referral and ambassador environments;
- technology-related services.

2. SCOPE OF THIS POLICY

This Policy applies to:

- website visitors;
- customers;
- Users;
- ambassadors;
- EMPs (External Marketing Promoters);
- referral participants;
- educational-platform participants;
- mobile-application users;
- community members;
- support inquiries;
- marketplace participants;
- prospective customers.

This Policy applies to information collected through:

- websites;
- software systems;
- mobile applications;
- online forms;
- customer-support channels;
- payment systems;
- educational systems;
- referral environments;
- marketing campaigns;

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- community systems;
- social-networking features;
- third-party integrations.

3. GDPR & DATA PROTECTION PRINCIPLES

Where applicable, CONNECT seeks to process personal information according to principles reflected under:

- the EU General Data Protection Regulation ("GDPR");
- applicable Italian privacy laws;
- applicable international data-protection requirements.

CONNECT seeks to process information:

- lawfully;
- transparently;
- proportionately;
- securely;
- for legitimate operational purposes.

4. INFORMATION WE COLLECT

CONNECT may collect the following categories of information:

4.1 Personal Information

Including:

- full name;
- date of birth;
- nationality;
- residential address;
- email address;
- phone number;
- government-issued identification;

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- verification documents;
- usernames and credentials.

4.2 Account & Platform Information

Including:

- account activity;
- login records;
- referral relationships;
- educational-platform activity;
- marketplace participation;
- community interactions;
- IP address;
- browser information;
- device information;
- operating-system information;
- session activity.

4.3 Payment & Transaction Information

Including:

- payment records;
- billing details;
- subscription history;
- purchase activity;
- transaction confirmations;
- wallet addresses where applicable;
- refund records.

CONNECT does not intentionally store complete payment-card details unless processed through approved and compliant payment-service providers.

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4.4 Compliance & Verification Information

Where applicable, CONNECT may collect:

- KYC documentation;
- sanctions-screening information;
- fraud-monitoring information;
- source-of-funds information;
- compliance-review information;
- identity-verification records.

4.5 Marketing & Communication Information

Including:

- marketing preferences;
- newsletter subscriptions;
- campaign engagement;
- communication history;
- support interactions;
- survey responses;
- social-media interactions.

5. HOW INFORMATION IS COLLECTED

Information may be collected through:

- account registration;
- software activation;
- purchases and subscriptions;
- customer-support interactions;
- educational participation;
- referral systems;
- payment systems;

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- cookies and analytics tools;
- community activity;
- mobile applications;
- marketing campaigns;
- identity-verification providers;
- third-party integrations.

6. PURPOSES OF PROCESSING

CONNECT may process information for purposes including:

- account administration;
- software-license management;
- educational access;
- platform functionality;
- marketplace services;
- customer support;
- payment processing;
- fraud prevention;
- AML/KYC compliance;
- sanctions screening;
- operational administration;
- analytics and system improvements;
- referral-program administration;
- community functionality;
- legal and regulatory obligations;
- marketing communications where permitted by law.

7. LEGAL BASIS FOR PROCESSING

Depending on applicable law, processing may occur based on:

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- User consent;
- contractual necessity;
- legitimate business interests;
- legal obligations;
- fraud-prevention interests;
- security obligations;
- compliance requirements.

Users may withdraw consent where legally applicable, without affecting prior lawful processing.

8. REFERRAL & COMMUNITY FEATURES

The Platform may include:

- referral systems;
- ambassador environments;
- educational communities;
- social-networking functionality;
- team structures;
- marketplace relationships.

Participation in referral or ambassador activities is entirely optional.

Users may access products, software, education, and Services without participating in referral activities.

Certain limited operational information may be visible to authorized participants within applicable referral or community structures where reasonably necessary for platform functionality.

CONNECT does not intentionally publicly disclose sensitive personal information beyond operational necessity.

9. COOKIES & TRACKING TECHNOLOGIES

CONNECT may use:

- cookies;
- pixels;

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- SDKs;
- web beacons;
- analytics tools;
- local-storage technologies;
- device identifiers;
- session technologies.

These technologies may support:

- platform functionality;
- authentication;
- security;
- fraud prevention;
- analytics;
- operational improvements;
- referral tracking;
- user preferences;
- marketing optimization where permitted.

10. TYPES OF COOKIES USED

10.1 Essential Cookies

Essential cookies may support:

- website functionality;
- account authentication;
- session management;
- platform stability;
- security procedures.

Certain essential cookies may be required for proper Platform functionality.

10.2 Performance & Analytics Cookies

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These technologies may support:

- website analytics;
- operational improvements;
- error tracking;
- usage monitoring;
- performance optimization.

Analytics information may be aggregated or anonymized where reasonably possible.

10.3 Functional Cookies

Functional cookies may support:

- language preferences;
- region settings;
- personalization;
- interface customization;
- session continuity.

10.4 Security & Fraud-Prevention Cookies

Security-related technologies may support:

- fraud prevention;
- unauthorized-access prevention;
- risk analysis;
- threat detection;
- authentication controls;
- security monitoring.

10.5 Marketing & Advertising Cookies

Where permitted by applicable law, marketing technologies may support:

- campaign tracking;

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- referral tracking;
- promotional campaigns;
- social-media integrations;
- marketing analytics.

Marketing technologies may involve third-party providers.

11. COOKIE MANAGEMENT

Users may manage cookies through:

- browser settings;
- device settings;
- cookie-consent tools where available;
- third-party privacy controls.

Disabling certain cookies may impact:

- authentication;
- platform functionality;
- operational stability;
- personalization;
- performance.

CONNECT does not guarantee full functionality where cookies are disabled.

12. MARKETING COMMUNICATIONS

CONNECT may send:

- operational notices;
- educational updates;
- platform announcements;
- security notifications;
- newsletters;

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- marketing communications where permitted by law.

Users may opt out of non-essential marketing communications through available unsubscribe methods.

Operational or compliance-related communications may still be sent where reasonably necessary.

13. THIRD-PARTY PROVIDERS

CONNECT may share information with approved third parties including:

- payment processors;
- identity-verification providers;
- cloud providers;
- hosting providers;
- fraud-monitoring systems;
- customer-support providers;
- analytics providers;
- security providers;
- marketing-service providers;
- marketplace integrations;
- competent authorities where legally required.

Third-party providers may process information according to their own policies and operational standards.

CONNECT is not responsible for independent third-party privacy practices.

14. INTERNATIONAL DATA TRANSFERS

Personal information may be processed or stored across multiple jurisdictions depending on:

- hosting infrastructure;
- operational requirements;
- third-party integrations;
- compliance obligations;
- cloud-service providers.

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Users acknowledge that international data transfers may occur.

CONNECT seeks to implement commercially reasonable safeguards relating to such transfers where applicable.

15. DATA RETENTION

CONNECT may retain information:

- for operational purposes;
- to comply with legal obligations;
- for fraud prevention;
- for accounting purposes;
- for tax obligations;
- for dispute resolution;
- for compliance monitoring;
- for security purposes.

Retention periods may vary depending on:

- jurisdiction;
- compliance obligations;
- product category;
- operational necessity;
- legal requirements.

16. DATA SECURITY

CONNECT seeks to implement commercially reasonable safeguards including:

- authentication systems;
- encryption measures;
- access controls;
- fraud-detection systems;
- security monitoring;
- internal-access restrictions;

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- backup procedures;
- incident-response procedures.

However, no online environment or transmission method can be guaranteed to be completely secure.

Users acknowledge inherent cybersecurity risks associated with digital systems.

17. USER RIGHTS

Depending on applicable law, Users may possess rights including:

- access rights;
- correction rights;
- deletion rights;
- objection rights;
- restriction rights;
- portability rights;
- withdrawal of consent;
- marketing opt-out rights.

Certain rights may be limited by:

- legal obligations;
- fraud-prevention requirements;
- security obligations;
- compliance requirements;
- mandatory retention obligations.

Requests may require identity verification.

18. CHILDREN'S PRIVACY

The Platform is not intended for individuals below the legal age required within the applicable jurisdiction.

CONNECT does not knowingly collect personal information from minors without legally required authorization.

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19. AML, KYC & COMPLIANCE MONITORING

Where applicable, CONNECT may conduct:

- identity verification;
- sanctions screening;
- source-of-funds reviews;
- fraud investigations;
- transaction monitoring;
- risk assessments;
- compliance reviews.

Failure to provide required compliance information may result in:

- restricted access;
- delayed processing;
- suspension;
- termination.

CONNECT may disclose information to competent authorities where legally required.

20. AUTOMATED SYSTEMS & ANALYTICS

CONNECT may utilize automated systems, AI-assisted technologies, or analytics systems for:

- fraud prevention;
- platform optimization;
- operational reporting;
- recommendation systems;
- user-experience improvements;
- security monitoring;
- marketing optimization.

Automated systems do not constitute:

- financial advice;

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- investment management;
- regulated advisory services.

21. THIRD-PARTY LINKS & SERVICES

The Platform may contain links or integrations relating to:

- blockchain systems;
- wallets;
- payment systems;
- educational integrations;
- marketplaces;
- external applications;
- third-party websites.

CONNECT is not responsible for:

- third-party privacy practices;
- external data handling;
- independent platform operations;
- third-party security standards.

Users should independently review third-party policies before engaging with external services.

22. INCIDENT RESPONSE

CONNECT may investigate:

- security incidents;
- suspicious activity;
- fraud attempts;
- unauthorized access;
- abuse of Services;
- policy violations.

CONNECT reserves the right to:

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- preserve records;
- restrict accounts;
- suspend access;
- cooperate with authorities;
- conduct internal investigations.

23. CHANGES TO THIS POLICY

CONNECT reserves the right to modify or update this Policy at any time.

Updated versions may be published through official channels.

Continued use of the Platform following updates may constitute acceptance of revised terms where permitted by applicable law.

24. GOVERNING LAW

This Policy shall be governed by applicable laws and regulations of the relevant operating jurisdictions.

Mandatory consumer and data-protection rights under applicable law, including GDPR-related rights where applicable, shall remain unaffected where legally required.

25. CONTACT INFORMATION

CONNECT Marketing FZE
Sharjah Publishing City Free Zone
United Arab Emirates

Support Email: support@connect.ac

26. FINAL DISCLAIMER

CONNECT operates as a:

- technology ecosystem;
- software-access environment;
- educational platform;

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- marketplace environment;
- community system;
- customer-acquisition framework;
- referral and ambassador environment;
- digital-services ecosystem.

Nothing within this Policy should be interpreted as:

- financial-services documentation;
- banking documentation;
- securities-offering materials;
- investment documentation;
- financial-advisory services.

This Policy is intended solely to explain information-handling and cookie-management practices within the operational scope of the CONNECT ecosystem.

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