

## AXB Website Privacy Policy

### General Information

This Privacy Policy explains how AXB ("we", "us", or "our"), a business duly established in the Cayman Islands (address: Pavilion East Cricket Square, 205 Elgin Ave, George Town KY1-1001, Cayman Islands, registration number: CO-421090), collects, uses, and protects personal information when you use our website and its contact form.

We are committed to safeguarding the privacy of our website users and have implemented appropriate measures to prevent unauthorized access or disclosure of your data. By using our website or submitting an inquiry via our contact form, you agree to the practices described in this Privacy Policy.

### Data Controller and Contact Information

AXB is the controller of your personal data collected through this website. If you have any questions or concerns about your personal data or this Privacy Policy, you can contact us at [contact@axb.co](mailto:contact@axb.co) .

### Personal Data We Collect

When you use our contact form, we collect certain personal information that you provide voluntarily. This includes:

- **First Name** – your given name.
- **Email Address** – an address at which we can reach you.
- **Message Content** – any other personal data you choose to include in the free-text message field of the contact form.

Providing this information is optional, but necessary if you wish to use the contact form and receive a response. If you choose not to provide required information (such as your name or email), we may not be able to contact you or address your inquiry.

Please do not include sensitive personal information (such as financial details, identification numbers, health information, etc.) in your message to us. We do not intentionally collect any sensitive data via the contact form.

## How We Use Your Data

We process the personal data collected through the contact form only for the purposes for which you provided it. Specifically, we use your information to:

- **Respond to Your Inquiries:** We use your name, email, and company name (if provided) to communicate with you and respond to the message or request you submitted.
- **Provide Requested Information or Support:** If you ask us a question or request information about our services, we will use the data you provided to supply that information or assistance.
- **Internal Record-Keeping:** We may keep a record of our communications with you (your inquiry and our response) for internal administrative purposes, such as improving our customer service or having a reference for any follow-up correspondence.
- **Ensure Website Functionality and Security:** We may use data about your use of the site (including technical information like your IP address and browser type, collected via server logs or cookies) to maintain the security and proper functioning of our website. This helps us protect the site and its users against fraud, abuse, or technical issues.

We will not use the personal data collected from you for any purposes incompatible with those listed above. In particular, we do **not** use your contact details to send you marketing communications unless you explicitly request or consent to it.

**Legal basis:** We process contact-form data under legitimate interests (to respond to your inquiry) and, where applicable, contract (to provide information you requested in view of entering into a contract).

## Cookies and Similar Technologies

Our website uses cookies and similar technologies to enhance your browsing experience and to collect certain information automatically:

- **What Are Cookies:** Cookies are small text files stored on your device (computer, tablet, smartphone) by websites that you visit. They allow the website to recognize your browser on subsequent visits. Similar technologies include web beacons, pixels, and local storage, which function in a way akin to cookies.
- **Why We Use Cookies:** We use cookies to ensure the proper and secure functioning of our website, to remember your preferences, and to gather statistical and analytical information. For example, cookies help us understand which pages or features are most popular, so we can improve our site. Importantly, our cookies do not contain

information that directly identifies you (such as your name or email); we do not use them to determine your personal identity.

Cookies on our site may be either **first-party cookies** (placed by us) or **third-party cookies** (placed by external providers, such as analytics service providers). For instance, we may use Google Analytics, which sets its own cookies, to collect anonymous usage statistics. By continuing to use our website, you consent to our use of cookies as described in this policy, unless you disable them through your browser settings.

You can control and manage cookies through your web browser settings. Most browsers allow you to block or delete cookies. However, please note that if you disable certain cookies, some features of our site may not function properly (for example, your preferences might not be remembered).

The cookies used on our website fall into the following categories:

- **Essential Cookies** – These cookies are absolutely necessary for the proper functioning of the website and to provide basic features. They enable core functionality such as security, network management, and accessibility. The site cannot function properly without these cookies.
- **Functional Cookies** – These cookies allow the website to remember choices you have made in the past (such as your username, language, or region) and to provide enhanced, more personalized features. They improve your experience by remembering your preferences and settings.
- **Advertising Cookies** – These cookies are used to deliver advertisements or promotional content that are relevant to you and your interests. They may also limit the number of times you see a given ad and help measure the effectiveness of advertising campaigns. (Note: Our site currently does not display third-party advertisements; if this changes, advertising cookies would be used to personalize ad content.)
- **Performance Cookies** – These cookies collect information about how you use our website, such as which pages you visit and whether any errors occur. They help us measure and improve the performance of our site by ensuring that pages load quickly and function correctly.
- **Analytics Cookies** – These cookies gather data on how visitors interact with our website. For example, they may count visits, track traffic sources, or record information about what pages are viewed and for how long. The information collected is aggregated and anonymous, helping us understand user behavior and improve our website.

**List of Cookies Used:** Below is a table that can be used to list the specific cookies our site uses, along with their purpose and storage duration. (This table will be updated as needed to reflect the cookies currently in use on our site):

Cookie Name	Description	Storage Period	Type
__utma	Collects data on the number of times a user has visited the Site as well as dates for the first and most recent visit. Used by Google Analytics.	2 years	HTTP
__utmb	Registers a timestamp with the exact time of when the user accessed the Site. Used by Google Analytics to calculate the duration of a website visit.	1 day	HTTP
__utmc	Registers a timestamp with the exact time of when the user leaves the Site. Used by Google Analytics to calculate the	Session	HTTP
	duration of a website visit.		

utmt	Used to throttle the speed of requests to the server. Used by Google Analytics.	1 day	HTTP
utmz	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	6 months	HTTP

## Data Sharing and Disclosure

We do **not** sell, rent, or exchange your personal data with any third parties or external partners for their own use. Your information is used exclusively by AXB for the purposes described in this policy.

In the normal course of business, we may rely on a few trusted service providers to support the operation of our website (for example, companies providing website hosting, data storage, or email delivery services). Such service providers may have access to personal data **only** to the extent necessary to perform their functions on our behalf, and they are obligated to keep the information confidential and secure. They are not permitted to use your data for any purpose other than carrying out work for us.

Aside from these service providers, we will not disclose your personal data to any third party unless we are legally required to do so. For example, we may need to share information if a law, regulation, court order, or government authority lawfully requires us to do so. In such cases, we will only disclose the data to the extent necessary to comply with our legal obligations.

## Data Security

We take data security seriously and implement appropriate measures to protect your personal information from loss, misuse, and unauthorized access or disclosure. These measures include technical safeguards (such as encryption, secure servers, and firewalls) and organizational policies (such as restricting access to personal data to authorized personnel only). We also regularly review our security procedures and update them as needed to address new potential threats or vulnerabilities.

Please be aware that, despite our best efforts, no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your personal data, we cannot guarantee its absolute security. You transmit information to us at your own risk, but we will use commercially reasonable means to protect your data.

### **International transfers:**

Where we use service providers outside the Cayman Islands, we ensure an adequate level of protection by using approved data transfer agreements or other safeguards recognised by the Cayman Ombudsman.

## Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required/permitted by applicable laws. In practice, this means:

- **Contact Form Submissions:** Personal data you provide via the contact form (such as your name, email, company, and message) is kept as long as needed to respond to your inquiry and conclude any follow-up communications. Once your inquiry has been addressed, we may retain the correspondence for a period of time for our records.
- **Record-Keeping:** We might keep your contact form data for a limited duration after our last interaction, in order to maintain a record of our communications (for example, if you contact us again, or to help us improve our services by reviewing inquiries). We will not retain this data longer than necessary for these purposes.
- **Consent-Based Retention:** If you have given us explicit consent to use your contact information for a specific ongoing purpose (for example, to send you updates or newsletters), we will retain your data until you withdraw your consent or until we have fulfilled the purpose for which you consented.
- **Legal Obligations and Disputes:** In certain cases, we may need to retain data for a longer period if required by law or to resolve any disputes or enforce our agreements.

For instance, applicable laws may require us to keep certain communications or records for a set time. Additionally, if there is an ongoing dispute or legal proceeding, we will retain relevant data until it is resolved.

After the applicable retention period has ended, we will either securely delete your personal data or anonymize it (so that it can no longer be associated with you). We apply the principle of data minimization, meaning we do not keep data longer than we genuinely need it.

## **Your Rights Regarding Personal Data**

We respect your rights regarding your personal data. Subject to applicable law, you may have the following rights:

- **Right of Access:** You have the right to request confirmation of whether we are processing your personal data, and if so, to receive a copy of that data.
- **Right to Rectification:** You have the right to request that we correct or update your personal data if it is inaccurate or incomplete.
- **Right to Erasure:** You have the right to request that we delete your personal data in certain circumstances (for example, if the data is no longer needed for the purposes it was collected, or if you withdraw your consent and no other legal basis for processing applies).
- **Right to Restrict Processing:** You have the right to request that we limit the processing of your personal data under certain conditions (for instance, if you contest the accuracy of the data, you can request we restrict processing while we verify your claim).
- **Right to Data Portability:** You have the right to obtain a copy of the personal data you have provided to us in a structured, commonly used, machine-readable format, and you have the right to request that we transfer this data to another controller, where technically feasible.
- **Right to Object:** You have the right to object to the processing of your personal data in certain situations. In particular, you can object at any time if we process your data based on our legitimate interests. If we were ever to process your data for direct marketing purposes, you could object at any time and we would stop processing your data for that purpose.
- **Right to Withdraw Consent:** If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. Withdrawal of

consent will not affect the lawfulness of any processing we conducted before your withdrawal.

To exercise any of these rights, please contact us at [contact@axb.co](mailto:contact@axb.co) . We may ask you to verify your identity before acting on certain requests, to ensure that we protect your information from unauthorized access. We will respond to your request as promptly as possible, and in any case within any timeframe required by applicable law. We respond to rights requests within 30 days of receipt (with any permitted extension explained in writing).

### **Changes to this Privacy Policy**

We may update or revise this Privacy Policy from time to time to reflect changes in our practices or for operational, legal, or regulatory reasons. When we make changes, we will post the updated Privacy Policy on this page and update the "Last updated" date below. We encourage you to review this page periodically to stay informed about how we are protecting your information.

If we make any material changes to the way we handle your personal data, we shall also notify you by additional means (if we're obligated to under applicable law), such as a prominent notice on our website or via email, to ensure you are aware of any significant changes.

This Privacy Policy applies only to the AXB website and the personal data collected through it (including the contact form). It does not apply to any services, products, or websites that are governed by separate privacy policies.

### **Your right to complain:**

In any matter related to this privacy policy you may complain to the **Office of the Ombudsman (Cayman Islands)**: [www.ombudsman.ky](http://www.ombudsman.ky)

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