# **Privacy Policy**

Emlube DMCC ("Emlube") treats the protection of your personal information with the utmost seriousness and thoroughness. The Policy has been developed in order to let you know that our company collects, uses and protects the information obtained from you through emlube.ae (hereinafter -"Site")

The most important principle of our work with personal information is confidentiality of your personal data. We commit to storing such information confidential not admitting its disclosure without your preliminary agreement and not selling, changing, publishing or disclosing the supplied personal information, except for the cases when we have to do so owing to the legislative act.

We use the supplied personal information only with the purposes stated in the present Policy. Please, check the Policy before using the Site.

If you press the "We use cookies to provide you with the best possible service and to continuosly improve our website. To find out more, read our privacy police and cookie policy" button in a pop-up electronic form on our Site, you agree with the present Privacy Policy.

You are informed and accept the fact that your consent given in an electronic form on the Site is the consent which fully meets the requirements of the legislation about personal information and allows to confirm the fact of it being received by "Emlube".

Pay attention that the consent to the use of the Policy is limited to this Site and is not applied to other Internet sources, which can also contain hyper links to the site.

#### **1. KEY TERMS**

1.1 Site is an informational resource located on the Internet: emlube.ae.

1.2 Site user is a natural person or a representative of a legal person who has all necessary authority and was created in accordance with the requirements of the present legislation, who has legal capacity and agency and uses the Site for obtaining or providing the information connected with "Emlube" services or for other purposes named in the Policy. 1.3 Personal data (personal information) is any information related directly or indirectly to identifying a natural person. Personal data may include, for example, your name and surname, an address, a mobile phone number and an email. Anonymous information that we cannot connect with your personality is not related to the "personal data" category.

1.4 Processing of personal data is any action (operation) or a set of actions (operations) performed with or without the use of automation equipment with personal data including its collecting, recording, organizing, structuring, storing, modifying (updating, changing), extracting, using, transferring (spreading, providing access), anonymising, blocking, deleting, destroying.

### 2. SUBJECT TO THE PRIVACY POLICY

2.1 The present Policy is applied to any information collected or sent via the Site with the use of any computing devices.

2.2. We do not collect or process special categories of personal data related to racial or ethnic origin, political views, religious or philosophical beliefs, memberships in trade unions, as well as genetic data, biometric data with the purpose of unequivocal identification of Site users, health data or data connected with sexual life or orientation of such users. "Emlube" also does not collect information about a criminal record and crimes committed.

2.3. We deliberately do not collect personal information from children under the age of 16 without a consent from a parent or a child's legal representative. If we know that a child under the age of 16 provided us with the personal information, we will take all the available measures to delete it. If you know that a child provided us with the personal information, contact us through the Support Service:

# 3. LAWFUL BASIS FOR PROCESSING OF PERSONAL DATA

We collect and process information about you only in such cases if we have lawful bases for this in accordance with the existing legislation. Lawful bases depend on the Site functionalities that you use and the way use them. We collect and use your information only when:;

- You gave your consent to the processing of your personal data for one or several purposes stated in the Policy.
- Processing is necessary to conclude and perform the contract.

- Processing is necessary to comply with the legislation acts or fulfil the obligations by the decision of the public authority.
- Processing is necessary to protect your interests.
- Processing is necessary to fulfil formal credentials submitted to us.
- Processing is necessary for other lawful interests pursued by us or the third party, except for the cases when such interests violate your interests or main rights and freedoms which require the protection of the personal data, in particular, when a child is a subject to the data.

#### 4. PROCESSING OF PERSONAL DATA

4.1. We process two main groups of personal data. The first group of personal data includes the personal information that you share voluntarily. If we ask you to share personal data, you can refuse at all times.

4.2. The second group includes the personal information that our Site processes automatically using Cookie files or similar technologies, as it is described in the Cookie Policy. Using Cookie files or similar technologies, we automatically process your technical information, for example, an IP-address, type of a device, a unique identification number of a device, type of a browser, time of access, a referer (the address of a previous page), a geographical location, etc.

4.3. Personal information allowed proceeding in accordance with the Privacy Policy is provided through filling in the registration and feedback forms on the Site and responding to the vacancies posted on the Site.

4.4. Registration or filling in the feedback form on the Site, respond to the vacancies posted on the Site, as well as attaching a CV, means that you accept the conditions of the Policy and give consent to proceed your personal data in accordance with the Privacy Policy. Your personal information includes: user's name; user's mobile phone number; email, as well as other personal data which you provide us with by sending attached documents including a CV in appropriate feedback forms on the Site.

4.5. We ask you to not share the information connected with racial or ethnic origin, political views, religion or philosophical beliefs, memberships in trade unions, as well as genetic data and any data concerning health, sexual life, crime record or security measures connected with it while using the Site. If you provide such information for some reason, it will be your direct consent to processing and using such information.

4.6. Nevertheless, any personal information provided by you will be protected by the Policy, except for the cases when we have a responsibility to disclose it in accordance with the existing legislation.

4.7. When you provide your personal information through the Site, you are supposed to share precise and truthful information about yourself. We do not have to check the reliability of the information provided.

### 5. PURPOSES FOR PERSONAL DATA PROCESSING

"Emlube" processes your personal information to provide better services. We process your personal data only for the following purposes:

- For development of our business and services provided.
- For personalization and enrichment of the provided information that will be actual and interesting for you.
- For connection with you including sending the notifications and information about the use of the Site.
- For staff recruitment.
- For leading statistical surveys and other researches on the basis of anonymous data.
- For any other purposes for which you have provided the data to "Emlube".

# 6. CONDITIONS FOR PERSONAL DATA PROCESSING

6.1. The information provided by you will be used by "Emlube" in accordance with the conditions of the Privacy Policy.

6.2. We store your personal data until it is necessary for the purposes of your personal data processing stated in the Policy. Personal data is processed with no time limit.

6.3. Your personal data may be submitted to the authorized public body in accordance with the existing legislation.

6.4. We will stop processing your personal data in one of the following cases:

- once the objectives have been met or in case of losing the necessity of meeting these objectives;
- on your request, if the processed personal information was received illegally or is not necessary any more for stated purposes of processing;

- at the end of the terms of your consent to personal data processing or in case the consent was revoked, if there are no other lawful bases for personal data processing;
- in case of termination of "Emlube" activities.

# 7. RIGHTS RELATED TO PERSONAL DATA

You have the following rights related to your personal data:

7.1. The right to personal data access. You have the right to access to your personal information which we store and which relates to you. You can check what personal data we process sending a request to our email: Emlube <u>hello@emlube.ae</u>. Under certain circumstances and in accordance with the existing legislation you have the right to receive a copy of your personal data provided by you in a structured, widely used and machine-readable format. You will not have to pay for the access to your personal information (or for implementation of any other rights). Nevertheless, "Emlube" may charge a reasonable fee or refuse to respond to your request if it is unjustified or repetitive.

7.2. The right to changing or correcting your personal data. You have the right to send us a request for changing your personal information if it is, for example, incomplete or wrong. To make changes to your personal data you need to send a request to our email: <u>hello@emlube.ae</u>.

7.3. The right to revoke the consent to the personal data processing. In such cases when we process your personal data on the basis of your consent, you may revoke your consent at any time. To revoke your consent to personal data processing you need to send a proper request to our email: <u>hello@emlube.ae</u>.

7.4. The right to restrict or prohibit personal data processing. You have the right to restrict or prohibit personal data processing at any time for justified reasons. After having received the request to hello@emlube.ae, we will stop or restrict the processing of your personal data, except for the cases when we have lawful bases to process personal data or if such processing is necessary to protect our rights.

7.5. Other rights of personal data subjects. On an equal basis with the rights to access, change, restrict or prohibit the processing mentioned above, you

have other rights related to that personal information that we store, such as the right to delete or transfer the personal data and the right to complain to the data protection authorities.

7.6. If you have a question or you would like to use your rights, contact us via our email: <u>hello@emlube.ae</u>. "Emlube" will make any effort to respond to your justified request within 30 days. Sometimes it may occupy more time if your request is particularly complicated or you have left several requests. In any case, we will inform you about the status of request consideration.

### 8. ADDITIONAL PROVISIONS

8.1. "Emlube" protects your personal information in the same manner as it protects its private information, for example, stores it on the secure servers which only certain "Emlube" employees have access to in order to prevent unauthorized people from accessing. We comply with the acknowledged international standards. We and our employees realize the necessity of providing users with privacy and take justified security measures to protect your data from loss, wrong use, unauthorized access, disclosure, changing and destruction. In order to protect personal data we introduce the employees of "Emlube" to the recommendations on data privacy and security and control their enforcement.

8.2. The current version of Privacy Policy was updated 1 January 2020. "Emlube" may periodically update existing Privacy Policy. For this reason we recommend you periodically check the relevance of the existing Privacy Policy version. A new version of Privacy Policy enters into force from the moment of being published on the Site. If you continue using the Site after the Policy has been updated, you confirm your consent with the changes made.

8.3. We hope that you will not need it, but if you need to complain about the use of your personal data, send email with the detailed information about the complaint to <u>hello@emlube.ae</u>Any complaints received will be subjects of consideration and we will respond to them within 30 days. You have the right to complain to the authorized public body.

8.4. If you have any questions or suggestions regarding the Policy or you would like to request for information concerning the processing of your personal data, please, send us an email to <u>hello@emlube.ae</u>.