

# Privacy Policy

Last Updated: February 15, 2023

## Introduction

This privacy policy ("Policy") describes how Industrust Procurement Consulting L.L.C ("Company", "Industrust," "we," and "our") processes, collects, uses and shares personal data when using this platform (the "Platform"). Please read the following information carefully to understand our practices regarding your personal data and how we will process data.

All capitalized terms used in this Privacy Policy shall have the same definition as provided in the Terms of Use, unless otherwise defined herein.

## Purposes of Processing

### What is personal data?

We collect information about you in a range of forms, including personal data. As used in this Policy, "personal data" is as defined in the General Data Protection Regulation, this includes any information which, either alone or in combination with other information we process about you, identifies your company or you as an individual, including, for example, your name, postal address, email address and telephone number.

### Why do we need your personal data?

We will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to the Platform. If you registered with us, you will have been asked to tick to agree to provide this information in order to access our services or view our content. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our website.

### How Do We Use The Information Collected?

We will use your personal information for the following purposes:

- To provide you with quality service and security, to operate the Platform, to perform our obligations to you and to develop and improve our service. We also use this information to establish and set up your account, verify or re-issue a password, log your activity, provide customer support and contact you from time to time. The information helps us to develop and improve our services, to understand and analyze our performance as well as your preferences and performance and to customize and personalize our service and enhance your experience.
- To ensure Platform integrity, prevent fraud and maintain a safe and secure services. For example, we use personal information to monitor, track and prevent fraudulent activities and other inappropriate activities, monitor content integrity, conduct security investigations and risk assessments, verify or authenticate information provided by you, enforce our Terms of Use and comply with applicable laws. We conduct certain behavioral analytics to achieve the above objectives and in limited cases, if we detect activity that we think poses a risk to the Industrust marketplace, other users, our community, or third parties, automated processes may restrict or limit your ability to use Industrust.

- To contact you, as requested by you or as otherwise approved by you or permitted according to this Privacy Policy.
- To promote and advertise the Platform and our services. For example, we use the information collected from you for the purpose of sending direct marketing messages, to show you information that may be of interest to you, to organize and facilitate referral programs, contests or other promotional activities or events.
- To maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

### Direct marketing

We use your personal information to send you direct marketing communications about our products, services or promotions from Indutrust that may be of interest to you or our related services. This may be via email, post, SMS, telephone.

Our processing of your personal information for marketing purposes is based on our legitimate interest, or on your consent, or as otherwise permitted according to applicable laws. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out link attached to each communication or by sending an email to [support@indutrust.io](mailto:support@indutrust.io).

We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

### How Long Do We Keep Personal Information?

We apply a general rule of keeping personal information only for as long as is required to fulfil the purpose for which it was collected. However, in some circumstances, we will retain your personal information for longer periods of time. We will retain personal information for the following purposes:

- As long as it is necessary and relevant for our operations, e.g. so that we have an accurate record of your dealings with us in the event of any complaints or challenge; and
- In relation to personal information from closed accounts to comply with applicable laws, prevent fraud, , resolve disputes, troubleshoot problems, assist with any investigation, enforce our Platform terms and take other actions as permitted by law.

## Collecting Your Personal Data

Depending upon our relationship with you, i.e. Registered User or Supplier, we may collect the following categories and types of personal information from and about you:

	Registered Users	Suppliers	Business purpose of collection of Information
Name, Email Address, Phone Number, Date of Birth, Job Title, Profile Data, IP Address	x	x	Provide and Improve the Platform, identification, and communications, marketing/advertising of Indutrust, security, legal, compliance and regulatory obligations.
Commercial Information such as website, market sectors, factory information		x	Identification, communications, marketing/advertising of Indutrust, security, legal, compliance and regulatory obligations.

(number, creation year, location, shareholders, headcount management and production), projects references, key customers, country of top 5 customers			
Corporate documents such as activities codes, trade or industrial license, certifications, catalogue and brochures and organizational chart.		x	<p>Identification, communications, marketing/advertising of Indutrust, security, legal, compliance and regulatory obligations.</p> <p>Legal Compliance: Companies are often required by law to maintain certain corporate documents. By making these documents available on the Platform, the company can demonstrate compliance with legal and regulatory requirements.</p> <p>Transparency: Providing access to corporate documents can help to build trust and transparency with customers and other stakeholders. It can demonstrate the company's commitment to ethical and responsible business practices.</p> <p>Due Diligence: Corporate documents can be useful in conducting due diligence, whether it's for partnerships or other business deals. By making these documents available on their website, the company can provide potential partners with the information they need to make informed decisions about working with the company.</p>
Financial data such as turnover, percentage revenue from export vs local market, banking letter and financial reports, <b>if applicable</b>		x	<p>Identification, communications, marketing/advertising of Indutrust, security, legal, compliance and regulatory obligations.</p> <p>Customer Confidence: Providing financial information helps also to build customer confidence. Customers may feel more comfortable doing business with a company that provides transparent financial information, as it can provide them with insight into the company's stability and ability to deliver on its promises.</p>
<p>Factory Customer view – “Virtual Tour”, <b>if applicable</b></p> <p>The Virtual Tour is not a mandatory requirement for registration. Suppliers may choose to allow all Users to have access to the Virtual Tour, or require prior consent from the Supplier to access the Virtual Tour. If a Supplier requires prior</p>		x	<p>Marketing and Branding: The visual tour can be used as a marketing tool to showcase the company's facilities and manufacturing processes to attract potential customers, investors, and partners.</p> <p>Transparency and Trust: It helps build trust and transparency with customers and stakeholders.</p>

<p>consent, the Supplier will be notified whenever a User requests access to the virtual tour, and will have the ability to provide or deny consent on a timely manner.</p>			
<p>Suggestion, complaints and inquiries</p>	<p>x</p>	<p>x</p>	<p>Investigate complaints or concerns to ensure that such complaints or concerns are addressed appropriately;</p> <p>Send optional customer satisfaction surveys once your complaint has been resolved in order to improve our processes;</p> <p>Evaluate the characteristics and needs of our customers to improve our solutions; and</p> <p>Communicate with you about Indutrust events, industry or privacy-related news to engage with you as a member of the privacy community in which we participate.</p>
<p>Opinion, feedback and surveys</p>	<p>x</p>	<p>x</p>	<p>If we engage in a general consumer survey, we process your survey responses. You may answer or not when it is presented to you. Withdrawing your consent will not be possible as we do not ask or collect identifying information and only use answers in large groupings, such as all “Yes” or “No” answers to a particular question. We would not be able to pull your answers out.</p> <p>If you participate in our services research and surveys – whether delivered by us or a service provider on our behalf – we may process your email address, job title, phone number, survey responses, company name, job function, state, country, relationship with Indutrust, and any comments you provide.</p> <p>We conduct online consumer surveys to learn about your views on important privacy-related issues based on our legitimate interest in better understanding the privacy market and to improve our solutions; we do not directly collect any personal information about you when we conduct these surveys, however cookies and data collection technologies may be used to manage the delivery of the surveys. You may choose to respond or not and may opt out of future communications of this nature. In part, this is through our legitimate interest in obtaining your feedback and part through your consent to such activities.</p>

## **Non-Identifying Information**

We also may collect other information, such as demographic data, information about your use of the Platform, and general project-related data (“Non-Identifying Information”). We may combine information collected from Users and Suppliers. This is typically accomplished using a mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify you directly, but it may be used to connect your activity and interests.

Combination of Personal and Non-Identifying Information: We may combine your Personal Information with Non-Identifying Information, but Indutrust will treat the combined information as Personal Information.

## **Automated Decision Making and Profiling**

We do not use your personal data for the purposes of automated decision-making. However, we may do so in order to fulfill obligations imposed by law, in which case we will inform you of any such processing and provide you with an opportunity to object.

## **User Profiles and Submissions**

Certain user profile information, including your name, location, and any video or image content that such user has uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others. Please remember that any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by anyone. Your user name may also be displayed to other users if and when you send messages or comments or upload images or videos through the Services and other users can contact you through messages and comments.

## **Updating Your Personal Data**

We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately.

We will make sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary or give you ways to update it quickly or to delete it - unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we will ask you to verify your identity before we can act on your request. If for any reason you have a problem with deleting your personal information, please contact Indutrust’s Customer Support and we will make reasonable efforts to delete any such information pursuant to any applicable privacy laws.

You can review and change your personal information by logging into the Platform and visiting your account profile page.

# **Security**

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the Internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us.

## Retention

We will only retain your personal data as long reasonably required for you to use the website until you close your account/cancel your subscription unless a longer retention period is required or permitted by law (for example for regulatory purposes).

## Complaints

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us through the information listed on our website or on our application. We will reply to your complaint as soon as we can and in any event, within 30 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority.

## Contact Us

To exercise any of your rights in connection with your personal information, we kindly ask that you open a Customer Relations ticket. Please include all the relevant details, so your ticket can be handled correctly. We will process any requests in line with any local laws and our policies and procedures. You may also contact us at [support@industrust.io](mailto:support@industrust.io).

If you have any questions (or comments) concerning this Privacy Policy, please email our team at [support@industrust.io](mailto:support@industrust.io) and we will make an effort to reply within a reasonable timeframe.