

**URUP CONNECT  
PRIVACY POLICY**

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## **1. ABOUT THIS POLICY**

- 1.1. We recognise and respect the right of an individual to privacy and the protection of personal information/data.
- 1.2. This policy sets out what categories of information URUP CONNECT may collect from you when you use the software as well as how URUP CONNECT processes that information.
- 1.3. By using the Website or the Software you warrant that you are over the age of 16 (sixteen) years old and acknowledge that URUP CONNECT may collect the information, as contained herein, from you.
- 1.4. If you have any questions about this policy or do not agree with it, please contact URUP CONNECT at the addresses listed below for your specific region before using the software. URUP CONNECT may amend this policy from time to time, so you should check this page from time to time to ensure that you are aware of any changes that have been made.
  - 1.4.1. USA and Territories: [usalegal@urupconnect.com](mailto:usalegal@urupconnect.com)
  - 1.4.2. European Union and Member States: [eulegal@urupconnect.com](mailto:eulegal@urupconnect.com)
  - 1.4.3. Other countries: [legal@urupconnect.com](mailto:legal@urupconnect.com)
- 1.5. This policy is effective from 12 October 2020.
- 1.6. By using any part of the software or providing information to URUP CONNECT you consent to URUP CONNECT processing your information as set out in this policy.

## **2. INCORPORATION BY REFERENCE**

- 2.1. This policy incorporates the provisions (and their subordinate provisions) as contained in the general terms and conditions of URUP CONNECT by reference.
- 2.2. The provisions incorporated into this policy from the terms and conditions must be read as being applicable to this policy, to the extent doing so does not materially change their meaning.
- 2.3. In the event that the provisions of this policy conflict with the terms and conditions, the provisions of this policy will prevail to the extent of the conflict.

## **3. MINORS**

- 3.1. If you are not yet 16 (sixteen) years old, you may only use URUP CONNECT with the consent of a parent, guardian or competent person.
- 3.2. In the event that we have collected personal information from a child younger than 16 (sixteen) years, without the necessary consent, we will delete that information as soon as reasonably possible after being made aware.

3.3. If you believe that we may have collected any information about a child younger than 16 (sixteen) years without the necessary consent required to do so, please notify us immediately.

#### **4. INFORMATION COLLECTED BY URUP CONNECT:**

##### **4.1. THROUGH THE SOFTWARE:**

4.1.1. In general, you may navigate the software without directly providing URUP CONNECT with any personal information.

4.1.2. Any domain name information that URUP CONNECT collects is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the software and the web pages viewed.

4.1.3. URUP CONNECT uses this information to measure the usefulness as well as the usability of the software and to improve its contents. However, additional services may be only available if URUP CONNECT has certain information about you.

##### **4.2. AUTOMATICALLY:**

4.2.1. When you use the software, URUP CONNECT automatically receives and records information from your browser and device platform, which may include interaction data, the hardware used to access our software, your mobile service provider, the operating system, your location, IP address, cookie information which includes your preferences for the software, surfing patterns and the page you requested. This information is stored in URUP CONNECT's server logs.

4.2.2. URUP CONNECT only uses this data in aggregate form and URUP CONNECT may provide this aggregate information to URUP CONNECT's associates to indicate how URUP CONNECT's customers, collectively, use the software, so that URUP CONNECT's associates may also understand how users make use of the software.

##### **4.3. COOKIES**

4.3.1. URUP CONNECT may use cookies (files that store information on your hard drive or in your browser) to determine whether you have visited the website where the software is hosted before and make it easier for you to maintain your preferences on the website and software.

4.3.2. By seeing how you use the software, URUP CONNECT can tailor the software around your preferences and measure usability of the software.

4.3.3. You can, should you choose to, disable cookies in your browser and delete all cookies currently stored on your computer. You can do this by modifying your browser's preferences appropriately.

##### **4.4. FROM YOU:**

4.4.1. Information about the content and services you express an interest in when you use the software;

4.4.2. Your name and contact information, including email address and company details which you may choose to submit to URUP CONNECT when you interact with the software;

4.4.3. Information about your location or similar location-based information;

- 4.4.4. Information regarding your personal or professional interests, demographics, experiences with URUP CONNECT's services and contact preferences in order to provide you with further correspondence about URUP CONNECT's services.
- 4.4.5. We will take reasonable steps to ensure that your personal information is complete, accurate, not misleading and updated where necessary.

## **5. FACEBOOK / TWITTER**

Your engagement information may be shared and posted to your Facebook or Twitter account should you elect this option.

## **6. SECURITY**

- 6.1. URUP CONNECT is committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure URUP CONNECT has physical, technical and administrative measures in place which safeguard the personal information URUP CONNECT collects through the software. URUP CONNECT uses encryption when collecting or transferring sensitive personal information, including passwords, or other information.
- 6.2. We have a responsibility to notify you if your personal information is accessed or acquired by an unauthorised person and we will notify you by way of electronic mail to your e-mail address.
- 6.3. We will collect your personal information directly, unless the collection of your information by another source will not prejudice you.
- 6.4. Despite our efforts to ensure the privacy and security of your data, the Internet is not a secure medium and your privacy cannot be guaranteed at all times.
- 6.5. We will not be responsible for any damages you or any third party may suffer as a result of the transmission of confidential or disclosed information that you make through our Website or Software, or for any errors or any changes made to any transmitted information.

## **7. LINKING**

- 7.1. Upon the client's request, URUP CONNECT may link to other third-party websites which are not within its control.
- 7.2. URUP CONNECT will not be responsible for the protection of any personal information which you provide to third parties.
- 7.3. You should exercise caution and view privacy statements applicable to third party websites or services.

## **8. HOW URUP CONNECT USES YOUR PERSONAL INFORMATION**

### **8.1. PROCESSING:**

8.1.1. We process information lawfully by ensuring that:

8.1.1.1. we are accountable;

8.1.1.2. we are purpose specific;

8.1.1.3. further processing is limited;

8.1.1.4. we maintain quality information; and

8.1.1.5. security safeguards are in place.

8.1.2. If you choose not to provide your personal information to us, it may result in us being unable to provide goods and services to you;

### **8.2. URUP CONNECT USES YOUR PERSONAL INFORMATION FOR THE FOLLOWING REASONS:**

8.2.1. to render services to you;

8.2.2. to provide services you have requested and to notify you about important changes to the software;

8.2.3. to respond to your enquiries and complaints or to process your requests in relation to your information;

8.2.4. to follow up on any enquiries and complaints as part of URUP CONNECT's customer care procedures;

8.2.5. to update URUP CONNECT's records about you and for the purpose of retaining records about you;

8.2.6. to communicate with you in the course of URUP CONNECT's ordinary business activities;

8.2.7. to improve URUP CONNECT's content and services by making them easier to use and by providing access to certain sections of the software;

8.2.8. to prevent or detect any unlawful activities; and

8.2.9. to evaluate the effectiveness of URUP CONNECT's marketing and for the purposes of research, training and statistical analysis in order to improve URUP CONNECT's services.

8.3. Should URUP CONNECT request any personal information from you, URUP CONNECT will furnish you with details on how the personal information you provide will be used.

8.4. URUP CONNECT or its associates may contact you by e-mail, phone, fax or post for the purposes set out in this section. By submitting such information to URUP CONNECT, you are deemed to have agreed to URUP CONNECT or its associates contacting you using these methods of

communication.

- 8.5. URUP CONNECT or its associates will continue to contact you using the methods you chose until you advise URUP CONNECT or its associates in writing that you no longer wish to be contacted using such methods.
- 8.6. Please note that you are required to accept at least one of the above methods as your chosen method of receipt of communication from URUP CONNECT.

## **9. SHARING YOUR PERSONAL INFORMATION**

- 9.1. URUP CONNECT will not transfer, disclose, sell, distribute or lease your personal information to third parties other than on the following basis:
  - 9.1.1. where URUP CONNECT has your consent to do so for the purpose of providing a service to you;
  - 9.1.2. where it is required by URUP CONNECT's associates who may, directly or indirectly, render certain services to URUP CONNECT or to you or in undertaking activities linked to the operation of such services on URUP CONNECT's behalf; or
  - 9.1.3. where the disclosure is in compliance with legal and/or contractual requirements that URUP CONNECT is subject to, including, but not limited to, intergovernmental agreements.
- 9.2. URUP CONNECT will not pass your personal information to third parties (other than on the basis set out in this policy and in accordance with appropriate disclosure requirements URUP CONNECT may be subject to) without your consent.

## **10. ACCESSING YOUR PERSONAL INFORMATION**

- 10.1. If you think that any personal information URUP CONNECT holds about you is incorrect or incomplete, please write to or e-mail URUP CONNECT ([info@urupconnect.com](mailto:info@urupconnect.com)) as soon as possible. URUP CONNECT will take the necessary steps to ensure that your personal information is corrected and/or updated.
- 10.2. You may also request access to the information we store about you by sending a request to us at [compliance@urupconnect.com](mailto:compliance@urupconnect.com)

## **11. REMOVAL OF PERSONAL INFORMATION**

Please refer to the Data Protection Policy of your region (United States of America or European Union or Other Countries).

## **12. RETENTION**

Please refer to the Data Protection Policy of your region (United States of America or European Union or Other Countries).

This Privacy Policy was updated on 2020-10-12