

# Privacy Policy

## INTRODUCTION

SKILL HUB – FZCO and its group companies and affiliates (hereinafter – “SKILL TRAVEL HUB” or “we”) understand that You are aware of and care about Your personal data protection, and we take that seriously. This Privacy Policy describes policies and practices regarding our collection and use of Your personal data, as well as sets forth Your privacy rights. We recognize that personal data protection is an ongoing responsibility, and we may from time to time update this Privacy Policy, as we undertake new personal data processing practices.

“You” in this Privacy Policy may refer to a visitor of our Website (hereinafter – “Visitor”), an Affiliate, who offers their products or services on our Website, including any shareholders, beneficial owners, principals, directors, and staff members accessing our Website (hereinafter – “Affiliate”), or a customer booking the products and services provided on the Website (hereinafter – “Customer”). “Visitor” may include “Affiliate” and/or “Customer” where appropriate. We will do our best to clarify who we are referring to at various points in this Privacy Policy.

## INFORMATION WE MAY COLLECT FROM YOU

Personal data:

### **We may collect and process the following personal data about You:**

- Information and documentation that You as a Customer provide within the process of booking products and services via <https://skilltravelhub.com> (hereinafter – the “Website”). Such information may include Your name, surname, e-mail address, telephone number and the name of Your company and other information which You provide, as well as the information regarding the requested booking, details of Your payment including the location and time of the transaction and details of your payment instrument;
- Information and documentation that You as an Affiliate provide to us in order to conclude an agreement. Such information may include Your name, date of birth, home, work or other physical address, country, telephone number, e-mail address, company name, company number, current position, previous places of employment, education, passport or ID data; information regarding the beneficial ownership in other companies;
- A record of correspondence / communication and/or the telephone call in the event You contact us. Such record may include Your name, surname, e-mail address, telephone number, name of Your company and other personal data You may disclose to us during such communication;
- Information about You as an Affiliate, which we receive from other sources, including, but not limited to, our business partners, service providers and subcontractors. Such information may include the data provided by the payment service providers, and other third parties, as well as publicly available information.

### **Other data:**

We may also collect non-personal information about You, which does not identify You as a specific individual. Such non-personal information that we may collect includes:

- Browser and device data, for instance, IP address, operating system and browser type. This is statistical data about the Website users’ browsing actions and patterns and does not identify any individual;
- Cookie data, such as time spent on the Website, pages visited, language preferences, and other anonymous traffic data;

· Company data, such as a company's name, product and service offerings, jurisdiction.

## HOW WE USE PERSONAL DATA

We use Your personal data in order to provide booking services and products to You and to respectively conclude contracts and carry out our contractual obligations. In this regard, we rely on a contract entered into by You and SKILL HUB - FZCO as the valid ground for the processing of Your personal data.

We are also required by law to constantly carry out various activities for the prevention of fraud, as well as for compliance with other legal obligations. In this regard, we rely on the necessity to comply with legal obligations as the valid ground for the processing of Your personal data.

Examples of how we may use Your personal data include:

- to enable the booking of products and services provided on the Website; · to ensure that content from the Website is presented in the most effective manner and to keep our Website safe and secure;
- to administer our Website;
- to verify Your identity for legal purposes;
- to conduct monitoring against any possible fraud;
- to respond to Your inquiries and provide customer support.

## HOW LONG WE WILL KEEP YOUR PERSONAL DATA

We will store Your personal data for the period necessary to fulfil the purposes listed above, unless a longer retention period is required or permitted by law. Please be aware that we may be required to retain Your personal data for various legal or regulatory reasons, for example, to ensure that transactions are appropriately processed, settled, refunded or charged-back, as well as to investigate any potential fraud and other legal requirements. This means that in the event where You, in the capacity of an Affiliate or a Customer, cease to make use of our services, we will still retain certain personal data in order to carry out our legal obligations.

## USE OF SERVICES BY MINORS

The services/products we provide are not directed to persons under the age of sixteen and we kindly ask such persons to not disclose their personal data to us.

## HOW WE DISCLOSE PERSONAL DATA

In certain circumstances we may disclose the personal data we have gathered about You to the following categories of recipients:

- **Our group companies.** In order to provide our services/products, we share personal data with our group companies. SKILL HUB – FZCO is the entity responsible for the general use of personal data by other group companies in relation to the services/products provided by SKILLTRAVEL HUB.
- **Third-party service providers.** We disclose personal data to service providers only when it is necessary to ensure the provision of our services, including, but not limited to processing of payments/transactions.
- **Our Affiliates.** In order to provide the booking services, we disclose Customer's personal data to the relevant Affiliate, whose services the Customer has booked.
- **Third-parties in relation to transfer of business.** For instance, if we sell any business or assets or merge with another business entity, it may be necessary to disclose personal data to the prospective business owners or partners.
- **Third-parties in relation to a legal obligation** or if we are permitted to do so by law. In certain circumstances we may be under an obligation to disclose or share Your personal data with auditors, regulatory authorities or law enforcement bodies in order to comply with a legal

obligation.

Your personal data may be transferred to and processed at a destination outside the European Economic Area (hereinafter – “EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our service providers. Where such transfers of personal data take place, we have concluded either Standard Contractual Clauses or other appropriate safeguards, in order to ensure that Your personal data is treated in a secure manner and in line with this Privacy Policy.

## YOUR RIGHTS

You have certain rights in respect to the way we treat Your personal data:

- You are entitled to **access** Your personal data and receive information regarding Your personal data that we process. You can do so by either signing in to Your Client Interface account or by contacting us at [support@skilltravelhub.com](mailto:support@skilltravelhub.com);
- You are entitled to **rectify** the information we have about You if it is inaccurate. You can do so by either signing in to Your Client Interface account or by contacting us at [support@skilltravelhub.com](mailto:support@skilltravelhub.com);
- You are entitled to **object** to the processing of Your personal data;
- You have the right to **revoke Your consent** for processing of Your personal data for the marketing purposes. We will inform You (before collecting Your data) if we intend to use Your data for such purposes or if we intend to disclose Your information to any third party for such purposes;
- You may also request us to **erase** Your personal data or cease the processing of Your personal data. However, please note that this right may be subject to certain exemptions. Namely, in situations, where we are under a legal obligation to retain Your personal data, we will not be able to fulfil Your request and, in such an event, we will inform You accordingly;
- You may also request us to **provide** Your personal data to You or **transmit** it directly to another controller and we will comply with such request, provided that the personal data processing previously carried out by us was based on Your consent or was necessary for the performance of a contract and where it is technically feasible;
- You have the right to **lodge a complaint** to the Office of the Commissioner for Personal Data Protection if You believe that we have not complied with the requirements of the General Data Protection Regulation with regard to Your personal data.

## COOKIES

The Website uses cookies to distinguish You from other Visitors of the Website. This helps to provide You with a good experience, while browsing the Website, and also allows us to improve the Website.

## SECURITY

All information provided by You to us is stored on secure servers and we use appropriate organizational, technical, and administrative measures to protect Your personal data. Once Your information is received, we use strict procedures and security features to prevent any unauthorized access.

However, please note that no transmission of information via the internet is completely secure and no storage system is guaranteed to be entirely secure. If You have any reason to believe that Your interaction with us is no longer secure, please contact us immediately.

## CHANGES TO THE PRIVACY POLICY

We may change or update this Privacy Policy. Any changes we may make to this Privacy Policy in the future will be posted on the Website and any such

changes will be effective starting from the date when we post the revised Privacy Policy.  
We may provide You with notifications regarding the changes in the Privacy Policy by posting them on our Website.

## CONTACT

If You wish to contact us regarding this Privacy Policy, please use the e-mail address [support@skilltravelhub.com](mailto:support@skilltravelhub.com).