

Frequants Ltd. (“Frequants”, “Us”, “We”, or “Our”) operates the website <http://frequants.com> (the “Website” and/or the “Service”). This page informs the user of the Website (“You and/or the “User”) of Our policies regarding the collection, use, and disclosure of personal data (as defined below) when You use Our Service and the choices You have associated with that data.

We use the Data (as defined below) to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this policy.

## 1. *Definitions*

### 1.1. **Service:**

Service means any service provided on the website <http://frequants.com> which is operated by Frequants.

### 1.2. **Personal Data (or “Data”):**

Personal Data means data about an identified or identifiable individual who can be identified, directly or indirectly, from that data (or from other information either in Our possession or likely to come into Our possession).

### 1.3. **Usage Data:**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### 1.4. **Cookies:**

Cookies are small blocks of data stored on Your device (computer or mobile device).

### 1.5. **Data Controller:**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information is, or is to be, processed.

For the purpose of this Privacy Policy, We are a Data Controller of your Personal Data.

### 1.6. **Data Processors (or “Service Providers”):**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

### 1.7. **Data Subject (or “User” or “You”):**

Data Subject is any living individual who is using Our Service and is the subject of Personal Data.

## 2. *The collection of information about You*

- 2.1. We may collect Personal Data about You in the following circumstances:
  - 2.1.1. When You access or use the Service;
  - 2.1.2. When You subscribe to a mailing list or newsletter and interact therewith; and
  - 2.1.3. When You interact with Us in any manner, including by sending Us an email.
- 2.2. You are under no legal obligation to provide Us with any information about You, and the provided Data thereof is at Your discretion and at Your own free will. However, if You do not provide Us with certain information about You, We may not be able to provide You with the Service (in part or in whole).

## 3. *Types of collected information*

- 3.1. We (or others on Our behalf) may collect the following types of Personal Data about You:
  - 3.1.1. Website usage information: this information includes online activity log, traffic information (including, without limitation, IP address, time of access, date of access, web and mobile page(s) visited, language used, crash reports and type of browser used, information regarding the device You used, the URL that referred You to the Website, geo-location data and Cookies). Some of this information may not identify You personally, and therefore not constitute Personal Data;
  - 3.1.2. Communication information: when You contact Us, including via Our Website and/or via email and/or by social media networks, You may provide Us with Your name, certain contact information (such as email address and telephone number) and the content of Your communication with Us. In addition, when You contact Us by phone, Your conversations with Our representatives may be recorded or documented in any other manner;
  - 3.1.3. Job application information: In case We list employment opportunities at Frequants, You may provide Us Personal Data about You, such as Your name, contact details, educational data, professional experience information, as well as any other information included in Your CVs.
- 3.2. You are responsible for ensuring the accuracy of the information that You provide Us (or others on Our behalf) with. Inaccurate information may affect Our ability to provide You with the Service (in part or in whole), as well as Our ability to contact You as contemplated in this Policy.

#### **4. Cookies**

- 4.1. We (or others on Our behalf) use various technologies to collect information when You interact with the Service which includes cookies and web beacons.
- 4.2. Cookies, which are small text files that are placed on Your computer or equipment when You visit certain online pages, track your activities, record Your preferences, and make the Service more tailored to Your needs by delivering a better and more personalized experience to You. Cookies are stored on Your computer and/or other equipment and are used by Us to help track your activity while using the Service and can allow Us to associate navigational information from browsing visits with Personal Data You provide via the Service.
- 4.3. Web beacons are graphic images that are placed on the Website or in an email that is used to monitor Your behavior while interacting with an email and are often used in combination with cookies
- 4.4. Please note that You can change the privacy settings in the browser that You use, delete the existing cookies, prevent the creation of cookies or click the setting that enables You to accept or deny the creation of a cookie every time that a cookie is detected. If You opt to not accept cookies and/or cancel Your acceptance of cookies, You may be limiting Your ability to enjoy all of the interactive features of the Service.
- 4.5. Examples of Cookies we us:
  - 4.5.1. Session Cookies. We use Session Cookies to operate our Service.;
  - 4.5.2. Preference Cookies. We use Preference Cookies to remember your preferences and various settings;
  - 4.5.3. Security Cookies. We use Security Cookies for security purposes;
  - 4.5.4. Advertising Cookies. Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.
- 4.6. We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

#### **5. Personal Data usage**

We may use Personal Data about You for the following purposes:

- 5.1. To operate the Website and provide the Service;
- 5.2. To contact You for the purpose of operational requirements;

- 5.3. To respond to Your queries, requests and/or complaints;
- 5.4. To analyze and improve the Service, as well as to offer new services;
- 5.5. To perform and maintain various activities supporting the offering and provision of Our Service, including, but not limited to, the Website (such activities include back-office functions, business development activities, strategic decision making, financing management, etc.);
- 5.6. To analyze the effectiveness of Our marketing and advertising campaigns and activities;
- 5.7. To protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims;
- 5.8. To fulfil Our legal or regulatory requirements.

## 6. *Sharing of Personal Data*

- 6.1. We will not disclose Personal Data about You to third parties except as detailed in this Policy.
- 6.2. We may share Personal Data about You with the following third parties or for the following purposes:
  - 6.2.1. Upon Your consent or instruction;
  - 6.2.2. Third parties providing Us services related to the offering of Our Service
  - 6.2.3. In the event that We sell, assign or transfer some or all of Our business or assets to a successor or acquirer, or if We are acquired by or merge with a third party, or if We file for bankruptcy or become insolvent;
  - 6.2.4. To protect Our rights, property and interest or those of third parties;
  - 6.2.5. To fulfil Our legal or regulatory requirements or to comply with a court order.
- 6.3. In addition, We may transfer bulk information about users of the Service to additional third parties and for additional purposes. However, before We do so, We will make sure that the information transferred to such parties is indeed anonymized and does not identify any natural person.
- 6.4. Any use of Personal Data by third parties is subject to their exclusive responsibility, and We shall not bear any responsibility inspect thereof.

## 7. *GDPR*

- 7.1. If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.
- 7.2. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us as mentioned above.
- 7.3. In certain circumstances, you have the following data protection rights:
  - 7.3.1. The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
  - 7.3.2. The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
  - 7.3.3. The right to object. You have the right to object to our processing of your Personal Data.
  - 7.3.4. The right of restriction. You have the right to request that we restrict the processing of your personal information.
  - 7.3.5. The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
  - 7.3.6. The right to withdraw consent. You also have the right to withdraw your consent at any time where Frequants relied on your consent to process your personal information.
- 7.4. Please note that we may ask you to verify your identity before responding to such requests.
- 7.5. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## 8. *Transfer of Personal Data abroad*

- 8.1. We may transfer Personal Data about You outside the jurisdiction which You are a resident of and store it in other jurisdictions and countries; the data protection and other laws of these jurisdictions or countries may not be as protective to Personal Data as those in the jurisdiction which You are resident – in these instances, We will take steps to ensure that an appropriate level of protection is given to Your Personal Data.

## 9. *Security*

- 9.1. We had implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under Our control. However, You must remember that any transfer of Personal Data via the internet cannot be fully secured. Therefore, We cannot ensure the protection of Personal Data about You when transferred via the internet to Us.

## 10. *Links to Other Websites*

- 10.1. When using the Service, You may find it to contain links to websites and/or applications of third parties. Other websites and applications may also reference or link to Our Website. We do not control such websites and applications, nor the collection and/or processing of Personal Data about You by such websites and applications, and thus We are not responsible for their privacy practices. This Policy does not apply to any actions taken via such websites and/or applications.
- 10.2. Whenever You access such third parties' websites and/or services, We recommend that You carefully review their privacy policies prior to using such websites and/or services and prior to disclosing any Personal Data about You.

## 11. *User Rights with Personal Data*

- 11.1. You are entitled to review, either by Yourself or through a representative authorized by You in writing or Your guardian, any Personal Data about You that is kept in Our database.
- 11.2. If You have reviewed the Personal Data about You and found it to be incorrect, incomplete, unclear or outdated, You may request Us to amend or delete the Personal Data.
- 11.3. You have the right to request deletion of Personal Data collected or maintained by Us. To do so, please contact us at [info@frequants.com](mailto:info@frequants.com). If submitting a request by email, We may ask for additional information to verify Your request.
- 11.4. You have the right to opt-out of the transfer of Personal Data to a third party. To do so, please submit a request via [info@frequants.com](mailto:info@frequants.com). If submitting a request by email, We may ask for additional information to verify Your request.

## 12. *Data Retention*

- 12.1. We keep your Personal Data for only as long as We need to. How long We need your Personal Data depends on what We are using it for, as set out in this Privacy Policy. For example, We may need to use it to answer Your queries about

the Service and as a result may keep Personal Data while You are still using the Service. We may also need to keep Your Personal Data for accounting purposes, for example, where you have made a purchase of any sort. If We no longer need Your Data, We will delete it or make it anonymous by removing all details that identify You. If We have asked for Your permission to process your Personal Data and We have no other lawful grounds to continue with that processing, and You withdraw Your permission, We will delete your Personal Data.

### 13. *Changes to the Policy*

- 13.1. We may change this Policy in Our sole discretion at any time. Any revisions to this Policy will be posted as an updated version accessible via the Website home page, with the date of the update of the Policy on the top of the page. We recommend that You revisit this Policy regularly so as to be kept apprised of any such changes.

### 14. *Contact Us*

For any queries relating to this Policy, please contact Us at [info@frequants.com](mailto:info@frequants.com).