

# FREELBEE PRIVACY POLICY

Version of January 23, 2024

## 1. GENERAL PROVISIONS

This Policy describes the procedures on processing of Personal data of Data subjects when they use the Website, or the Services and/or interact with our online advertisements or marketing emails.

Policy sets forth the basic rules and principles by which we process your Personal data and mentions our responsibilities while processing your Personal data according to transparency obligations.

This Policy is enacted in accordance with the General Terms and Conditions of Company regulating provision of the Services and the User Agreements enacted in accordance with the Terms, which are the essential parts of the Terms. The terms and definitions provided for in the Terms and the User Agreements apply to this Policy unless the provisions of the Terms or the User Agreement contradict the provisions of the Policy.

By accepting this Policy, you agree to be legally bound by it and all terms incorporated by reference. If you don't agree with this Policy or any of its clauses, you shall immediately cease to use our Website.

Company respects your privacy and values its importance and is wholly committed to keeping your information safe and secure. We process your Personal data in accordance with privacy laws and this Policy to make sure your data protection rights are implemented and enforceable.

## 2. THE FOLLOWING TERMS AND DEFINITIONS SHALL APPLY TO THIS POLICY

<b>"Policy"</b>	This Privacy Policy.
<b>"Website"</b>	Website on the Internet with the URL: <a href="https://freelbee.com">https://freelbee.com</a> .
<b>"Company", "Ourselves", "We", "Us"</b>	FREEL PRIME PORTAL L.L.C., a company incorporated under law of United Arab Emirates, Register No. 2064919, License No. 1228768, having its registered office at The offices at Ibn Battuta Gate 16-0, Jabal Ali First 591-0, Dubai, UAE E, represented by it's Manager, Mr. Denis Sevcuic.
<b>"User", "Data subject" or "You"</b>	A natural person who visits the Website and / or uses the Services. The term "User" also applies to representatives of Users who are natural persons in case the User is a legal entity.
<b>"Personal data"</b>	Means information that relates to Data subject and identifies Data subject.
<b>"Controller" or "Data controller"</b>	Refers to Company.
<b>"Processor"</b>	Means a natural person or a legal entity that is engaged in the processing of Personal data of Data subjects under the contract concluded with Company.
<b>"Platform"</b>	An interactive SaaS Platform. The purpose of the Platform is to simplify the document flow and payment procedure between legal entities and freelancers. Access to the Service is provided via the Website.

**“Services”**

Services on providing remote access to the Platform, provided by the Company via the Website.

**“Account”**

Means a set of data about the User stored in a computer system of Company necessary for providing the User with the Services. The Account is the personal page of the User on the Website.

### 3. GUARANTEES

We do not process any special categories of Personal data such as racial or ethnic origin, political opinions, religious or philosophical beliefs etc. If Company finds out that such Personal data has been processed Company will immediately delete such Personal data and will take reasonable measures preventing the processing of such Personal data in future.

We guarantee that we do not sell Users Data directly for a monetary reward. Company will not sell, rent, or loan any personal Information to any third party.

We do not process personal data of Data subjects that are under 18 years of age and do not provide Services to Users who are below this age limit.

When the Data subject visits the Website and Company offers the Data subject to provide consent with the Personal data processing under section 3 of the Policy, Company will warn the Data subject in advance that the Data subject shall not provide the consent to the Personal data processing if the Data subject is less than 18 years of age.

### 4. SCOPE OF APPLICATION

This Privacy Policy applies to the following individuals:

- Visitors of the Website with whom Company does not have a contractual relationship;
- Clients who use our Services, including client UBOs or representatives
- Independent Contractors who use our Services
- Suppliers who provide products or services to Company
- Participants of webinars, trade events, surveys, etc.

By using our Site and/or our Services as well as engaging with Company in any way, you agree to the collection and use of your information in accordance with this Privacy Policy.

### 5. PERSONAL DATA PROCESSED

We collect the following categories of Personal data from you:

#### 5.1. Technical data:

- IP address, language, country, browser type, and version, time zone setting, browser plug-in types, some location information about where you might be, operating system and version;

#### 5.2. Data on how you use the Website:

- Your URL clickstreams (the path you take through the Website), page response times, download errors, how long you stay on web pages, what you do on those pages, how often, and other actions;

#### 5.3. Cookies (please see details in Section 11):

5.4. Company processes the following Personal data of Users:

- The full name of the User;
- The email address of the User;
- Country of User's residence;
- City and full address of the User;
- User's telephone number;
  
- The information about User's field of expertise and competences;
- The corporate information about the User, namely:
  - (a) The name of the legal entity (if the User is the legal entity);
  - (b) The registration information about the User (the registration number of the User as the entrepreneur or legal entity, TIN and VAT numbers, if applicable);
  - (c) The payment details of the User (including information about bank accounts or online wallets of the User which is necessary and sufficient for making payments in favor of such accounts).
  
- The information about User's representative (if the User is a Business User as defined in the Terms and the User Agreement for the Provision of Business Service), namely:
  - (a) The first and family name of the User's representative;
  - (b) The information about the status (role) of the representative in respect to the User;
  - (c) The representative's country of residence and full address;
  - (d) The representative's email address and telephone number.
  
- Records of communication with Company or Company's Processors.

5.5. Company processes the following Personal data of Users necessary for the verification of Users' Accounts:

- The photo of the User's (if the User is a natural person) or User representative's (if the User is a legal entity) face.
- The photo of the User's (if the User is a natural person) or User representative's (if the User is a legal entity) ID (passport, driving license, or other type of ID that Company considers appropriate subject to the laws applicable to the User or User's representative).

We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes.

## 6. SOURCES OF YOUR PERSONAL DATA

We may collect Personal Information about you or your businesses from any of these sources:

- Directly for you when you use our Services, complete a contact form, request marketing communications, participate in surveys or contact us.
- Company collects profile and usage data when you interact with our Website and/or Services, including, without limitation, your security details, app or your web browser settings, marketing choices and data from the devices you use to connect to our platform so we can provide you with our products or services.
- We also collect information through the use of cookies and other internet tracking software while you are using our website or mobile apps as described in detail in this Policy.
- From third parties:
  - o Companies, business partners or individuals that introduce you to us.
  - o Business partners, service providers, sub-contractors, advertising networks, analytics providers, search information providers, fraud protection services, Payment Service Providers (PSPs) who help us authenticate your identity, improve the quality of our Services, promote our Services and protect our business. We may also receive Personal Information about you from providers that help prevent, detect, and prosecute unlawful acts, money laundering, and fraudulent behavior.

- o Social networks and other technology providers (for instance, when you click on one of our Facebook or Google adverts).
- o Public information sources such as (without limitation) national company registries.
- o Market researchers.
- o Government, law enforcement agencies, authorities, and regulatory bodies.

## **7. CONSENT TO PROCESSING OF PERSONAL DATA**

Company obtains several ways for receiving consent to processing of Data subject's Personal data depending on the type of the Personal data processed.

When the Data subject opens the Website and starts browsing the Website, window with the following text will appear on the Data subject's screen:

"By continuing to browse and use this website, I provide Company, a legal entity FREEL PRIME PORTAL L.L.C., incorporated under law of the United Arab Emirates, Register No. 2064919, License No. 1228768, having its registered office at The offices at Ibn Battuta Gate 16-0, Jabal Ali First 591-0, Dubai, UAE, and Company's processors with the consent to processing of my personal data in accordance with Privacy Policy.

By pressing the button "I agree", I also confirm that I am at least 18 (Eighteen) years of age. If I am less than 18 (Eighteen) years of age, I shall not press the button "I agree."

I understand that if I press the button "I do not agree" or ignore this window and do not press any button at all, I may not be able to use all the functions of this website which are necessary for receiving the services provided by the Company."

The window will also include the buttons "I agree" and "I do not agree". If the Data subject presses the button "I agree", the Data subject will provide Company and Company's Processors with the consent to processing of Data subject's Personal data.

If the Data subject presses the button "I do not agree" or ignores the appeared window and does not press any button at all, the Data subject will refuse to provide Company and Company's Processors with the consent to processing of Personal data.

When the User creates the Account or otherwise voluntarily provides Company with the Personal data, the User shall put a tick in the box next to the following text:

"By putting a tick in the box, I agree with processing of my personal data in accordance with the Privacy Policy of Company, a legal entity FREEL PRIME PORTAL L.L.C., incorporated under law of the United Arab Emirates, Register No. 2064919, License No. 1228768, having its registered office at The offices at Ibn Battuta Gate 16-0, Jabal Ali First 591-0, Dubai, UAE. I understand that if I do not put a tick in the box, Company is entitled to refuse provision of the services offered by Company."

If the User puts a tick in the box in accordance with this paragraph of the Policy, the User will provide Company and Company's Processors with the consent to processing of User's personal data.

If the User does not put a tick in the box in accordance with this paragraph of the Policy, the User will refuse to provide Company and Company's Processors with the consent to processing of Personal data. In this case, the Company is entitled to refuse provision of the Services because provision of the Services is impossible without processing of Personal data.

When the User verifies the Account in accordance with the procedure prescribed in the Terms, the User shall provide Company and Company's Processors with the Personal data.

## **8. ACCOUNTS ON THE PLATFORM**

In order to use the Services, the User shall create the Account and pass through the verification process in accordance with the procedure prescribed in the Terms.

If the User refuses to create the Account or verify the Account, Company may refuse provision of the Services if provision of the Services is impossible without creation of the Account and verification of the Account.

In order to create the Account and verify the created Account, the User shall provide Company with the Personal data provided for in the Policy.

The User having the Account may change the name, telephone number, email address and/or other Personal data that was specified by the User during the creation of the Account. However, the information provided by the User shall be valid and veridical. If Company finds out that the User provided Company with incorrect information about the User, Company has the right to block or/and delete the Account of the User and discontinue provision of the Services.

The User may at any time delete the Account and ask Company to delete all the Personal data associated with the Account in accordance with the Policy. If the User deletes the Account, the User will not be able to use the Services in accordance with the Terms and the User Agreements.

When the User creates the Account Company will ask the User to provide the information about User's date of birth. If the information about the date of birth reveals that the User is less than 18 years of age, the Company will refuse creation of the Account and provision of the Services and will delete all the information about the User that has already been collected.

## 9. LEGAL GROUNDS FOR THE DATA PROCESSING

There are legal grounds necessary for the processing of Personal data and we count on them to process your Personal data. We use the main four grounds to process your Personal data: consent, contract, legal obligation, and legitimate interests:

- **Consent** – the freely given, informed, and unambiguous indication of your wishes to the processing of your Personal data for a specific purpose which signifies agreement to the processing of Personal data.
- **Contract** – a legal ground for the processing of your Personal data necessary for us to perform a contract or terms and conditions to which you are a party or in order to take steps at your request prior to entering into the contract or terms and conditions.
  - In cases where we need to process personal data for the performance of the contract with you or as required by law and you refuse to provide your information, we may not be able to perform the contract with you and consequently, we may not be able to provide certain services to you.
- **Legal obligations** – a legal ground for the processing of your Personal data when it is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate Interest** – a legal ground for the processing of your Personal data when it is based on our legitimate interests or the legitimate interests of a third party, provided that your rights do not outweigh those interests and interests and those interests have a specific purpose, they are necessary, and they are balanced.
  - Our legitimate interest is centered around enhancing the quality of our Services, optimizing operational efficiency, and maintaining a competitive edge in the market.
  - Our legitimate interest is to maintain the reliability and availability of our services by detecting and preventing security threats, fraud, money laundering and other crime, unauthorized access, risk, and other activities that could harm our business, Website, or Services.

- o Our legitimate interests to manage our business operations efficiently, deliver our products and services, and ensure the financial stability of our company.
- o Our legitimate interest to ensure that the online Platform operates smoothly and effectively to provide the services or features it offers to Users.

## 10. PURPOSES OF USING PERSONAL DATA

Type of Data	Legal ground	Why do we need it?
Personal data of Users provided for in para. 5.1 of Policy.	Your consent.	<ul style="list-style-type: none"> <li>• Marketing and advertising purposes.</li> <li>• Improving the work of the Website.</li> <li>• Improving the quality of the Services.</li> <li>• Analytical purposes - analyzing and studying how our Customers use the Service.</li> </ul>
Personal data of Users provided for in para. 5.2 of Policy.	Your consent.	<ul style="list-style-type: none"> <li>• Marketing and advertising purposes.</li> <li>• Improving the work of the Website.</li> <li>• Improving the quality of the Services.</li> <li>• Analytical purposes - analyzing and studying how our Customers use the Service.</li> </ul>
Personal data of Users provided for in para. 5.3 of Policy.		<ul style="list-style-type: none"> <li>• Marketing and advertising purposes.</li> <li>• Analytical purposes - analyzing and studying how our Customers use the Service.</li> </ul>
Personal data of Users provided for in para. 5.4 and 5.5 of Policy.	Your consent. Legitimate interest.	<ul style="list-style-type: none"> <li>• Identification of the User or/and User's representative.</li> <li>• Provision of the Services.</li> <li>• Management of the contractual relationship with you to provide you with our Services.</li> <li>• Verification of Users' Accounts.</li> <li>• Communication with Users.</li> <li>• Analytical purposes.</li> <li>• Resolving disputes with Users.</li> <li>• Communicate with you about our Website and Services, such as to notify of changes and updates and to provide you with customer support and troubleshooting.</li> <li>• Marketing and advertising purposes.</li> </ul>

## 11. COOKIES

Company uses cookies to help Data subjects navigate through the Website and efficiently perform the functions of the Website.

Cookies are small text files downloaded by the internet browser of the Data subject to his PC/tablet computer, mobile phone or any other device used by the Data subject for access to the Website.

Cookies are used in order to ensure a personalized experience of the Website use and convenient Website navigation. They help to track the most visited web pages, determine the efficiency of advertising and web searches, and give an indication of the Data subject behavior, thereby contributing to improvement of communication means and products offered to Data subjects.

Some cookies operate from the moment of the Data subject's access to the Website till the end of a particular session in the browser. These files become useless and they are automatically deleted upon closing the browser. Such files are called session cookies.

Some cookies are also saved on device between the sessions in the browser and they are not deleted after the browser is closed. Such cookies are called persistent cookies

## **12. TRANSFER OF PERSONAL DATA**

Company does not share personal data with any third parties for the purposes not related to processing of Personal data. Company does not sell Personal data to third parties and has no intention to do so.

Company may transfer Personal data of Data subjects to third parties, if Company believes that it is required by applicable law, regulation, court proceedings, or request issued by a public authority, or if such information needs to be disclosed for the settlement of conflict situations (in particular, with respect to the Services), ensuring security to the Data subjects.

Company may transfer Personal data of Data subjects to third parties, for the purposes related to processing of Personal data, namely to payment service providers.

The Personal data of Data subjects may be provided by Company to third parties in connection with such events as merger or sale of Company's assets, amalgamation and restructuring, financing, and acquisition of a business as a whole or in part, or during the negotiations of such matters.

Company may disclose Personal data of the Data subject to third parties in situations, which are not expressly stated hereby, subject to obtaining the Data subject's consent to disclosure of information pertaining to him/her.

We may be transferring your Personal Data to a country that does not have the same data privacy protections as may be afforded in the UAE.

Company ensures that where we do so, for such transfers we obtain contractual commitments (such as the Standard Contractual Clauses) from them in order to protect your personal information or put in place other adequate safeguards to protect your Personal Data.

Company may share Personal Data with authorized third-party agents or contractors that perform services for Company, located in and outside of the UAE. If Company shares Personal Data with a third party, Company requires that those third parties agree to process Personal Data based on Company's instructions and in compliance with this Privacy Policy. In all cases, any transfers of Personal Data out of the UAE are subject to appropriate safeguards that are compliant with the applicable law.

We may share your Personal data with our third party service providers in order to provide our services. Some of them are indicated below:

- Website analytics companies to analyze data and improve our services and the Website such as Google Analytics;
- Payment services such as, but not limited to Light Technology Limited (<https://transak.com>).
- Verification service Sumsb (<https://sumsub.com>).

## **13. SECURITY OF PERSONAL DATA**

Company takes all the reasonable measures to protect Data subject's Personal data from unauthorized access by third parties, as well as against loss, misuse, alteration, or destruction of Personal data, including the following:

- Only authorized personnel of the Company have access to the Personal data of Data subjects, and these employees and contractors are required to treat this information as confidential.
- We will not permit any third parties to contact you directly on an unsolicited basis in relation to their own products or services. We do not sell, trade, or rent your Personal data to others.

- We use certain security measures to help keep your Personal data safe, but we cannot guarantee that these measures will stop any users trying to get around the privacy or security settings on the Website through unforeseen and/or illegal activity.
- We are constantly improving our data security systems and doing everything in our capacity to prevent its leakage. In case such a leak occurs, we undertake to notify Users and the regulatory authority about the incident as quickly as possible, as well as to make every effort to minimize negative consequences.
- We test systems for vulnerabilities and security issues at least once every 12 months.
- Access to confidential data is protected, for example, through passwords or access tokens.

## 14. STORAGE AND DESTRUCTION OF INFORMATION

We strive to limit the period of Personal data processing to the necessary minimum and not to store them for longer than is reasonably necessary.

Company stores the Personal data of Data subjects provided for in section 2 of the Policy as long as such Personal data is needed to reach the purposes prescribed in section 6 of the Policy.

Company stores the Personal data of Users provided for in paras.2.4-2.5 of the Policy as long as the User uses the Services. The User discontinues using the Services when the User deletes the Account. When the User deletes the Account, the User has the right to ask the Company to delete all the Personal data associated with the Account in accordance with the Policy.

After the User stops' using the Services, Company has the right to store Personal data of the User during 3 (three) years after the last Service was provided to the User. In this case, the personal data may be stored for the following purposes:

- Compliance with any legal, fiscal, insurance, and other requests in accordance with applicable law.
- Improvement of the Services quality.
- Research and analytics with respect to the Services use.
- Direct marketing.

Upon expiry of the 3 (three) years term, Company shall delete or anonymize such information.

## 15. THE RIGHTS OF DATA SUBJECT

Each Data subject has the following rights:

<b>Right of access</b>	The Data subject is entitled to receive from Company the information about Personal data that is processed by Company, the purposes of Personal data processing, the categories of Personal data recipients, the period of Personal data storage, and the information about the transfer of Personal data to other jurisdictions.
<b>Right to lodge a complaint with a supervisory authority</b>	The Data subject is entitled to file a complaint against Company with a supervising authority of Data subject's habitual residence or place of work, or with a supervising authority located in a place of possible infringement, or with a supervising authority of Company's residence, which supervises the compliance of Company with Personal data legislation.
<b>Right to rectification</b>	The Data subject is entitled to rectification of inaccurate data about the Data subject.
<b>Right to erasure</b>	The Data subject is entitled to erasure the Personal data about the Data subject.



<b>Right to data portability</b>	The Data subject is entitled to receive Personal data about the Data subject in a structured, commonly used, and machine-readable format and transmit such data to another controller.
<b>Right to object</b>	The Data subject is entitled to object to Personal data processing on the grounds relating to a particular situation (for example, if Company processes Personal data for marketing purposes).
<b>Right to withdraw</b>	Data subject's consent to Personal data processing.

If the Data subject is intending to use one of the rights provided for in the Policy, the Data subject shall send a mail or an email to Company provided in Policy.

Once we receive any of your requests we will consider and decide on it within 1 month unless there is a justified requirement to provide such information faster. This term may be extended according to the applicable law. We may request specific information from you to confirm your identity when necessary and reasonable. This is a security measure to ensure that Personal data is not disclosed to any person who has no right to receive it.

## **16. ENACTMENT AND UPDATING OF THE POLICY**

The Policy available is presented in the most up-to-date version. Over time, we may unilaterally amend the Policy, including complying with the latest changes in the applicable law and jurisprudence. All changes come into force from the moment they are published on this page unless a different period is indicated in the text of the amendments.

By posting the new version of the Policy on the Website, Company notifies Data subjects about the enacted amendments of the Policy. We ask you to regularly check for the latest version yourself.

Company may also send emails to Users notifying the Users about the enacted amendments of the Policy. However, the absence of such emails does not affect the legality and validity of the updated version of the Policy.

By continuing to browse the Website after the new version of the Policy is enacted, the Data subject agrees to process his personal data in accordance with the updated version of the Policy.

## **17. CONTACTING COMPANY**

If you still have any question or need clarification with regard to our privacy practice, please contact us:  
Email: [hello@freelbee.com](mailto:hello@freelbee.com).

### **CONTACT INFORMATION**

FREEL PRIME PORTAL L.L.C.  
Register No. 2064919  
License No. 1228768  
Address: The offices at Ibn Battuta Gate 16-0, Jabal Ali First 591-0, Dubai, UAE  
E-mail: [hello@freelbee.com](mailto:hello@freelbee.com)