

SKILLS TRIBE PRIVACY POLICY

1. INTRODUCTION

This Privacy Policy describes how your personal information is collected, used, and shared when you visit or make a purchase from www.skillstribе.com.

By providing us with your data, you warrant to us that you are over 13 years of age.

It is very important that the information we have about you is accurate and updated. Please let us know if at any time your personal information changes by emailing us at support@skillstribе.com.

2. PERSONAL INFORMATION COLLECTION AND USAGE

Personal information means any data or detail used to identify an individual. It does not include anonymized data.

When you visit the site, we may collect:

- **Communication Data:** This includes any communication that you send to us whether through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you avail to us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims. Our lawful ground for this processing are our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

Some examples include:

- **Blogs and Forums:** We may provide an opportunity for you to post information to blogs, forums or other public areas

on the services. By doing so, you consent to the posting of any personal Information that you provide. You should be aware that such personal information can be read, collected, or used by other visitors to these public areas. We have no control over how these visitors use your Personal Information.

Inquiries. If you send us a comment or question or make an inquiry to customer support, we will retain the information that you provide to us for the purpose of responding to you, as well as for improving our services and customers' use of our services.

- Customer Data: This includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between

you and us and/or taking steps at your request to enter into such a contract.

Some examples include:

. Registration: When you register on the Services, such as to subscribe to a newsletter, request information or access a Product, you will be asked to provide certain Personal Information, which we will use to fulfil your request.

. Surveys: We may ask you to complete surveys or opinion polls from time to time. We only use the information that we collect from surveys in an aggregate manner not in individually identifiable form. We may use specific comments shared on surveys, in an anonymized way. We may also reach out for more clarification on survey responses and potentially request more and permission to share. But we will never share anything personally identifiable shared on a survey unless given consent.

. User Data: This includes data about how you use our website and any online services together with any data

that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

- **Technical Data:** This includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other

online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Some examples include:

Web Logs: We maintain web logs that automatically record basic information about everyone who visits the Services.

We use web log information to help us design our website, to identify popular features, to improve our services, and for other managerial and analytic purposes. We may also use web logs to help identify any person who may be misusing the Services. These logs contain:

- The Internet domain from which you access the Services.
- Your IP address.

- The type of browser and operating system that you use.
- The date and time you visited the Services.
- The pages that you visited on the Services.
- The address of the website you linked from to get to the Services.
- Marketing Data: This includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

More specifically, here are some examples:

Linking from Emails: If you click a link to any of our sites from an email message from us, we will be able to identify your email address and associate that email address with the manner in which you use the Sites (e.g. which pages you visit or whether you make a purchase).

Visitors: If you are just visiting the Sites and not registering, requesting information, contacting us, or posting to a public area of the Services, and you did not access the Sites from a link contained in one of our email communications, we will not ordinarily collect any Personal Information about you except through web logs, as described below. In that case, we obtain the information that you provided and will use it to respond to your inquiry or fulfil your request if we can. We do not share any of this information with anyone else, except to respond to your request, if you consent, or as otherwise described in this privacy policy.

Web Logs: We maintain web logs that automatically record basic information about everyone who visits the Services.

We use web log information to help us design our website, to identify popular features, to improve our services, and for other managerial and analytic purposes. We may also use web logs to help identify any person who may be misusing the Services. These logs contain:

- The Internet domain from which you access the Services.
- Your IP address.
- The type of browser and operating system that you use.
- The date and time you visited the Services.
- The pages that you visited on the Services.
- The address of the website you linked from to get to the services
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts

or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

SENSITIVE DATA

We do not collect any sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if

necessary. For more information on this please email us at support@skillstribе.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you through you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this:

https://www.skillstribе.com/cookies_policy/

We may receive data from third parties such as analytics providers like Google based outside the EU, advertising networks such as Facebook based outside the EU, search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if:

(i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

OPTING-OUT FROM RECEIVING COMMUNICATIONS

You may opt-out from having your personal information used for certain purposes. For example, if you purchase a product or service but do not wish to receive any additional marketing material from us, you may indicate your preference on our order form.

If you no longer wish to receive any promotional or other communications from us, you may opt-out by following the instructions included in each email communication.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or OR by emailing us at support@skillstribе.com

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

5. HOW WE SHARE YOUR INFORMATION

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.

- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- With third party advertising platforms so that we can create marketing campaign advertising (e.g. using your email address to create a Facebook targeting audience).
- When you participate in an interactive area of our website, service, and product, your information may be displayed to other users: such information may include, your name, photo, the comment, and other information you chose to provide at the time of submission. In the case of surveys, we will never share personally identifiable information without express consent.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it

in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same level of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which gives personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. DATA SECURITY

We have put security measures in place to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow

access to your personal data only to those employees and partners who have a business knowing such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

8. PASSWORDS

To use certain features of the Website or its Content, you may need a username and password. You are responsible for maintaining the confidentiality of the username and password, and you are responsible for all activities, whether by you or by others, that occur under your username or password and within your account. You agree to notify us immediately of any unauthorized or improper use of your username or password or any other breach of security. To help protect against unauthorized or improper use, make

sure that you log out at the end of each session requiring your username and password.

It is your responsibility to protect your own username and password from disclosure to others. We cannot and will not be liable for any loss or damage arising from your failure to protect your username, password or account information. If you share your username or password with others, they may be able to obtain access to your personal information at your own risk.

By using our Website and its Content you agree to enter true and accurate information on the Website and its Content. If you enter a bogus email address, we have the right to immediately deactivate your account.

We will employ our best efforts to keep your username and password(s) private and will not otherwise share your password(s) without your consent, except as necessary when the law requires it or in the good faith belief that such action is necessary, particularly when disclosure is

necessary to identify, contact or bring legal action against someone who may be causing injury to others or interfering with our rights or property.

9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under data protection laws, EU residents have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at support@skillstribе.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

11. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

12. COOKIES

We may use the standard "cookies" feature of major web browsers. We do not set any personally identifiable information in cookies, nor do we employ any data-capture mechanisms on our Website other than cookies. You may choose to disable cookies through your own web browser's settings. However, disabling this function may diminish your experience on the Website and some features may not work as intended. We have no access to or control over any information collected by other individuals, companies or entities whose website or materials may be linked to our Website or its Content.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy here:

https://www.skillstribе.com/cookies_policy/

13. ASSIGNMENT OF RIGHTS

In the event of an assignment, sale, joint venture, or other transfer of some or all of our assets, you agree we can assign, sell, license or transfer any information that you have provided to us. Please note, however, that any purchasing party is prohibited from using the Confidential Information or Other Information submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy without your prior consent.

14. COLLECTION OF INFORMATION BY THIRD PARTIES

We may use a third-party advertising company to serve ads when you visit our Site. If we do so, this company may use information (not including your name, address, email address or telephone number) about your visit to the Services in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to the Services, the advertiser might place or recognize a unique “cookie” on your browser.

We may offer you the opportunity to contact other companies, such as advertisers, marketing affiliates and content providers, to obtain information or to buy products or services. You decide when and whether to give your Personal Information to these companies. If you provide information, its use and security is governed by the policies and practices of those companies and not by this privacy policy.

We make no representations or warranties about any of these other companies or their privacy or security policies. Once you click through to an unaffiliated website, this privacy policy no longer applies. We strongly urge you to read the applicable policies of these other companies and their websites.

15. DO NOT TRACK.

There will be no difference in how we collect or use data if you set your web browser to send a “Do not track” or similar request when you visit this site.

16.LINKS

Our site includes links to other websites whose privacy practices differ from ours. If you submit personal information to any of those websites, your information will be subject to their practices and policies.

17.CHANGES IN PRIVACY POLICY

This Privacy Policy is subject to change from time to time. Such changes and/or modifications shall become effective immediately upon posting our updated Privacy Policy. You acknowledge and agree that it is your responsibility to review this Site and this Privacy Policy periodically and to be aware of any modifications. We will notify you of any changes to this Privacy Policy by posting those changes on this page.

If you have any questions about this Privacy Policy, please contact us at support@skillstribе.com.

CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by emailing us at support@skillstribе.com