

## Privacy and Cookie Policy

### Introduction

This is the Privacy and Cookie Policy (the "Policy") of AVENTURINE INFORMATION TECHNOLOGY L.L.C, a company registered in Marina Plaza, office 1904, Dubai, U.A.E. - P.O. Box 451592 and on behalf of itself, its affiliates, and subsidiaries (together, "we", "us", "our" or "Aventurine").

Aventurine respects your privacy and is committed to ensuring that your personal information is collected, used, processed, and disclosed in accordance with the UAE Federal Personal Data Protection Law ("PDP") (applicable in UAE).

This Policy is structured in the following steps to describe how we operate [www.aventurine-mea.com](http://www.aventurine-mea.com) (the "Site").

- What information is collected?
- How is the information collected?
- How do we use the information?
- To whom do we share the information?
- How long do we retain the information?
- What are cookies?
- How do we use cookies?
- What are your rights?

### What Information Is Collected?

While you visit and browse our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally, identifiable information may include but is not limited to, your name, email address, company name, job title, and phone number.

We collect your Personal Information to set up an account. Please note that refusal to provide Personal Information may result in our inability to provide you with our services, to communicate with you, or to improve and customize our services to you.

### How is the Information Collected?

- Personal Information  
We obtain relevant Personal Information:
  - Through direct interactions or publicly available sources such as the company website, LinkedIn, other platforms, and news alerts.
  - When you connect with us, i.e., email us and register your Personal Information on our Site, etc.
- Data  
We refer to the automatically collected information as "Data" and collect Data using cookies and log files. When you visit and browse the Site, we automatically collect Data about your device, including information about your web browser, IP address, age, gender, location, website usage, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect Data about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.  
(“Personal Information” and “Data”, together “Information”).

### How do We Use the Information?

We use the Information if we have your consent or if another legally permitted reason applies. This includes fulfilling a contract with you or when it is in our fair and reasonable legitimate business interest to use the Information.

✓ **Ways we use the Information:**

- To enable the creation of credentials/subscriber user ID to access our services and products
- To collect insights on how you interact with us so that we can personalize our communications with you and improve our website and services
- To provide news and information services including email briefings and newsletters
- To give you access to online tools and to invite you to events that we and our partners organize
- To send you details of surveys, campaigns, or other initiatives that we co-ordinate
- To conduct client due diligence
- To maintain security and manage access to our offices, systems, and our website
- To our terms of engagement, website terms of use, and other terms and conditions
- To manage our supply chain including identifying and maintaining contact with business partners
- Other purposes that we have identified at the point of collection

✓ **Security**

The security of the Information is important to us, and we strive to implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk of unauthorized access, destruction, use, modification, or disclosure, the costs of implementation, and the nature, scope, context, and purposes of processing as well as the risk of varying likelihood and severity for your rights and freedom.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you. In no circumstances will the data collected by us be passed on to third parties nor will a link with personal data be established without your consent.

**To Whom do We Share the Information?**

We will not sell, distribute, or lease your Personal Information to third parties unless we have your consent or are required by law to do so. We treat all the Information with respect in the following manner.

- We may disclose your Personal Information to Aventurine investors, fund managers, business partners, suppliers, service providers, and advisors for the purpose of our internal business process and to help enhance our services.
- We may disclose the Information where required to do so by law or subpoena or if we believe that such action is necessary to pursue our legitimate interest of complying with the law and the reasonable requests of law enforcement.
- We will only transfer the Information outside of the Middle East with your consent or on the basis that the transfer is compliant with the PDP and other applicable laws.

**How Long Do We Retain the Information?**

We do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, to comply with any legal, regulatory, or reporting obligations, or to assert or defend against legal claims.

**What are Cookies?**

Our site uses so-called "cookies". Cookies are small text files, which are stored in your web browser, and can collect data that is linked to the use of our Site. This enables Aventurine to remember your actions and preferences, such as login, IP address, language preferences, browser, operating system, font size, and other display preferences, etc. (together "Data"), over a period. Based on the data contained, we can facilitate your navigation, make your next visit easier, and enable the correct display of our Site.

Aventurine uses functional and non-functional cookies. Functional cookies are necessary to ensure the functionality of our Site or services. Non-functional cookies are those we use to collect data on your website usage and to remember the selections you make. The cookies are further sub-divided into:

- **Session Cookies**  
A session cookie is only stored for the duration of your visit to the internet, i.e. during a single internet session. When you close your internet browser, this session ends, and the cookie is deleted. Session cookies can be used to track the web pages you visit and the options you use
- **Persistent Cookies**  
Persistent Cookies remain on your terminal and enable us to recognize your browser on your next visit. Persistent cookies are stored for longer than session cookies and are automatically deleted after a specific period.
- **Essential Cookies**  
We use essential cookies to authenticate users, keep them logged in, and prevent fraudulent use of user accounts. We also use essential cookies to get usage statistics of the Site.
- **Third-party Cookies**  
In addition to our own cookies, we may also use various third-party cookies to deliver advertisements for our service across the web. The advertising techniques we use do not collect Personal Information.

#### **How do We Use the Cookies?**

When you use Aventurine Site, the cookie sends information back to us. Aventurine uses cookies to analyze your visit to the Site, to recognize returning visitors and learn which services/topics they are interested in, to share statistical information via social media, and to personalize the Site and advertisements in line with your own preferences.

#### **What are Your Rights?**

You have certain rights in relation to your Personal Information, including the right to request:

- Access to and obtain a copy of your Personal Information
- Rectify your Personal Information if it is no longer accurate
- Erase your Personal Information if our retention is no longer necessary for the purposes for which it was collected
- Restrict or object to the processing of your Personal Information in certain circumstances

If you have any questions about these rights, or you would like to exercise any of them, please contact us. We will consider and act upon your request, in accordance with PDP within 20 business days of the receipt of your request.

Cookies stored on your devices can be deleted by you at any time. You can also use our Site without cookies. You can deactivate the use of cookies at any time via the cookie settings of your browser. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

#### **How to Contact Us?**

If you have any questions about this Policy, please contact us:

[info@aventurine-mea.com](mailto:info@aventurine-mea.com)

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#### **Changes to this Policy**

We reserve the right to update or amend this Policy regularly. In the case of material changes, we will notify you either through the email address you have provided us or by placing a prominent notice on our website. The revised Policy, with the revisions, is effective and binding on all users accessing the Site. This Policy was updated for the last time on November 1, 2022.