

## PRIVACY POLICY

The ECHO Group of companies (“ECHO”) respects your concerns about privacy. This Privacy Notice describes the types of information we collect about individuals on <https://www.weareecho.com/> (the “Site”) as well as any email communications we send, how we use the information, with whom we share it, and the choices available regarding our use of the information. The Privacy Notice also describes the measures we take to safeguard the personal information, how long we retain it and how individuals can contact us about our privacy practices and to exercise their rights.

### Applicability of this Privacy Notice

This Privacy Notice applies only to the information we collect on this Site, via our mailing lists and through any related systems and data collection methods we hold and not to any information we collect through other external methods or services, including websites owned or operated by our affiliates, vendors or partners.

### Information We Obtain

#### *Information You Provide*

We may collect and store personal information (such as name and other contact details) that you choose to provide to us through the Site or when you contact us. “Personal Information” is information that identifies you as an individual or relates to an identifiable individual. The types of personal information we collect may include:

- Contact information, such as your name, email address and telephone number; and
- Other personal information you may submit to us, such as when you contact us.

### Automated Collection of Data

When you use the Site, we may obtain certain information by automated means, such as browser cookies, beacons, device identifiers, server logs and other technologies. The information we obtain in this manner may include your device IP address, domain name, identifiers associated with your devices, device and operating system type and characteristics, web browser characteristics, language preferences, clickstream data, your interactions with the Site (such as the web pages you visit, links you click and features you use), the pages that led or referred you to the Site, dates and times of access to the Site and other information about your use of the Site.

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Cookie technology holds information a site may need to personalize a visitor’s experience. Cookies may also be used for security purposes.

You can stop certain types of cookies from being downloaded on your computer by selecting the appropriate settings on your web browser. Most web browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie and how to disable existing cookies. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). The Site is not designed to respond to “do not track” signals received from browsers. Please note that without cookies or other automated tools you may not be able to use all of the features of the Site.

These technologies help us (1) track and understand how you use and interact with the Site; (2) measure the usability of the Site; (3) understand the effectiveness of our communications; and (4) otherwise manage and enhance the functionality of the Site. We may use the information collected through these technologies for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat such

information as Personal Information under applicable law, then we may use and disclose such information for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Notice.

### Third Party Web Analytics Services

We use third-party online analytics services, such as Google Analytics. The service providers that administer these analytics services use cookies and similar technologies to collect and analyse information about use of the Site and report on activities and trends and diagnose technical issues. To learn more about Google's practices, please visit <https://policies.google.com/technologies/partner-sites>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

### How We Use Personal Information

We use the Personal Information we obtain on the Site for legitimate business purposes, to further our relationship with you and for other purposes, including to:

- Provide our services to you; process, evaluate and respond to your requests and inquiries; and send newsletters, industry updates or administrative information to you, such as changes to our terms, conditions and policies. We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- Operate, evaluate and improve our business (including developing new services; enhancing and improving our services; analysing our services; managing our communications; performing data analytics and market research; learning about our visitors, analysing our services and website; facilitating the functionality of our website and performing accounting, auditing and other internal functions). We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Verify your identity to ensure security for the other purposes listed here and protect against, identify and prevent fraud, security breaches and other criminal activity and risks. We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Comply with and enforce applicable legal requirements, relevant industry standards and our policies, including this Privacy Notice and/or Agency's Terms and Conditions or Terms of Use. We will engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.
- Aggregate and/or anonymize Personal Information so that it will no longer be considered personal information. We do so to generate other data for our use, which we may use and disclose for any purpose.

### Personal Information Sharing

We share your Personal Information with:

- Our ECHO related entities for the purposes described in this Privacy Notice. You can consult the list and location of such entities [here](#).
- Our service providers who perform services on our behalf, such as hosting this Site or data analytics. We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena), including laws outside your country of residence; (2) in response to requests by, or to cooperate with, government agencies, such as law-enforcement authorities, including outside of your country of residence; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to protect our rights, privacy, safety or property and/or that of our affiliates, you or others; (5) in connection with an investigation of suspected or actual illegal activity; (6) in connection with the sale or transfer of all or a portion of our business, assets or stock (including in the event of a reorganization, dissolution or liquidation); or (7) otherwise with your consent.

### Cross-Border Transfer

Your personal information may be processed and stored in any country where we have facilities or in which we engage service providers, and, by using the Site, you understand that your information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law-enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

**ADDITIONAL INFORMATION REGARDING THE EUROPEAN ECONOMIC AREA (“EEA”):** Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection, according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your personal information. You may obtain a copy of these measures [here](#).

## Your Rights and Choices

We offer you certain choices in connection with the personal information we obtain about you. If you would like to request to review, correct, update, suppress, restrict or delete personal information, to object to the processing of personal information or to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), please contact us as specified in the [How to Contact Us](#) section of this Privacy Notice. We will respond to your request consistent with applicable law.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

You can unsubscribe from our marketing mailing lists by following the “Unsubscribe” link in our marketing emails. If you would like to unsubscribe from any other type of marketing you receive from us, please contact us as specified in the [How to Contact Us](#) section of this Privacy Notice.

## Other Online Services and Third-Party Features

The Site may provide links to other online services and websites for your convenience and information and may include such third party features as apps, tools, widgets and plug-ins (e.g., Office 365, ZOHO One, LinkedIn, Instagram, Facebook and Twitter buttons). These services and websites may operate independently from us. The privacy practices of these third parties, including details on the information they may collect about you, are subject to their own privacy statements. To the extent any linked online services or third-party features are not owned or controlled by us, ECHO is not responsible for these third parties’ information or other practices.

## Retention of Personal Information

We retain personal information for as long as needed or permitted in light of the purposes for which we obtained it and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Site or our services to you;
- Whether there is a legal obligation to which we are subject; and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitation, litigation or regulatory investigations).

## How We Protect Personal Information

We seek to use reasonable administrative, technical and physical safeguards designed to protect personal information within our organization. Unfortunately, no information transmission or storage system can be

guaranteed to be 100 percent secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the [How to Contact Us](#) section of this Privacy Notice.

### Children's Personal Information

The Site is designed for a general audience and is not directed to children under the age of 16. Agency does not knowingly collect or solicit personal information from children under the age of 16 through the Site. If you believe that a child under the age of 16 may have provided us with personal information through the Site, please contact us as specified in the [How to Contact Us](#) section of this Privacy Notice.

### Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. Any changes will become effective when we post the revised Privacy Notice on the Site.

### How to Contact Us

ECHO, located at Office 3308, BB2 Mazaya Business Avenue, Jumeirah Lakes Towers, Dubai, United Arab Emirates is the company responsible for collection, use and disclosure of your personal information under this Privacy Notice.

To contact us in relation to this Privacy Notice or any privacy matter, including our use of your personal information or to exercise other applicable privacy rights, please use the following contact details:

**ATTN:** Group Operations Director     [privacy@weareecho.com](mailto:privacy@weareecho.com)

**Our GDPR Data Protection Officer ("DPO") may be contacted via post or email using the following details:**

Group Operations Director  
ECHO Group  
3308 Mazaya Business Avenue BB2,  
Jumeirah Lakes Tower,  
Dubai, United Arab Emirates  
[privacy@weareecho.com](mailto:privacy@weareecho.com)

You have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available [here](#).