

Privacy Policy

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Please read this Privacy Policy carefully. By using the website, or using any service that Sanctions Hub ("Sanctions Hub", "Company", "we" or "us") provides (jointly referred to as "Website", "Sites" or "Services"), you agree to the terms of this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use the Website or the Sanctions Hub services.

This Privacy Policy is incorporated into the Terms of Service between Sanctions Hub and Customer (the "Agreement"). Capitalized terms not defined herein shall have the meaning ascribed to them in the Agreement.

If you subscribe to Sanctions Hub's services, view our materials or website ("Customer"), we may receive and store information which you provide to us about yourself, your services, business and your clients ("Users").

THIS PRIVACY POLICY ONLY GOVERNS SANCTIONS HUB'S USE OF YOUR PERSONAL INFORMATION. THE USE OF USER'S PERSONAL INFORMATION BY CUSTOMER (OR OTHER THIRD PARTIES) IS NOT CONTROLLED BY SANCTIONS HUB, AND USER SHOULD REVIEW CUSTOMER'S PRIVACY POLICY INDEPENDENTLY. SANCTIONS HUB IS NOT RESPONSIBLE AND WILL BEAR NO LIABILITY TO CUSTOMER'S PRIVACY POLICY OR TO CUSTOMER'S COMPLIANCE WITH IT.

What personal information does the Customer provide to Sanctions Hub?

We receive and store any information you provide to us through the Website or otherwise (for example, if you contact us by telephone or e-mail). As a Customer, when you register to the Sites and/or Services, you may be asked to provide Sanctions Hub an active e-mail address and other contact and personal details (or other allowed means of identification), and to select a password. To the extent applicable, any such information may be provided by you either directly (by submitting it yourself) or by signing up to the Sites and/or Services using your social network account (for example, but not limited to, connecting your Facebook, Instagram, Etsy, Google or Twitter account to our Services) and selecting to grant the Sites and/or Services access to certain data available on such account(s).

Sanctions Hub can ask you to provide additional payment and transaction related personal information, to the extent required to provide the Services.

Sanctions Hub does not have any obligation under this Privacy Policy with respect to information which a Customer provides and which is intended to be publicly available.

You may also provide Sanctions Hub certain details concerning your organization, such as, but not limited to, the organization's billing details, main contact persons, and business needs and preferences. If such information includes personal information related to others, you confirm that you have brought this policy to their attention and received their permission to the upload of their details to the Sites and/or Services and to the use of their details under this policy.

Please bear in mind that false, incorrect, incomplete, or outdated information can prevent you from registering and using the Services and/or Sites or impair Sanctions Hub's ability to provide you with the Services and to contact you.

What internet traffic does Sanctions Hub collect?

Certain of the Services and/or Sites provide a comprehensive solution to Users and Customers, by providing up to date information about global and local Sanction Lists. When you use such Services and/or the Sites, the information routed via the Services and/or Sites is accessible to Sanctions Hub.

When you use the Services and/or the Sites, Sanctions Hub may collect information, such as, but not limited to, session durations, page impressions, Internet protocol (IP) addresses, details from your device, for example, the operating system and browser that you use, and users' activities on the Services and/or Sites, the domain name that served you to access the Services and/or Sites, and content types and origins.

Sanctions Hub will also store information related to online data or metadata, such as web page addresses, structure, data fields and images.

Further information is collected when you and Sanctions Hub exchange communications, for example, when you submit an inquiry to customer support.

What does Sanctions Hub do with your personally identifiable information?

Sanctions Hub uses personally identifiable information for the following purposes:

- To provide and operate the Services and the Sites;
- To send you updates and notices and to provide you with information related to the Services and/or the Sites
- To enforce the Agreement;
- To contact you as and when it is necessary for providing the Services;

- To comply with any applicable law, respond to lawful requests of personal information by public authorities, and assist law enforcement agencies as required, including to meet national security; in any case where Sanctions Hub believes that the use of the information is necessary to prevent imminent physical harm or damage to property;
- To collect fees and debts, and to prevent fraud, misappropriation, infringements, identity thefts and any other misuse of the Services and/or the Sites;
- To take any action in any case of dispute, or legal proceeding of any kind between you and Sanctions Hub, or between you and other users or third parties with respect to, or in relation with the Services and/or the Sites.

Important notice about privacy of persons under the age of 16

The Services and the Sites are not intended for use by persons under the age of 16. If you are not 16 years old or older, then you cannot use any of the Services or the Sites and must not provide any of your personal details.

Sanctions Hub does not knowingly collect or solicit any information from anyone under the age of 16 on this Service and encourages parents to monitor their children's use of the Web. Sanctions Hub will delete a child's personally identifiable information if a parent so requests in writing – please refer to “How to get in touch” section of this Privacy Policy. If Sanctions Hub learns that a child under the age of 16 years has provided personally identifiable information to Sanctions Hub without verifiable parental consent, Sanctions Hub will use commercially reasonable efforts to delete such information from Sanctions Hub's databases.

How does Sanctions Hub share your personally identifiable information with others?

For example, but not limited to, Sanctions Hub shares personally identifiable information with others in the following situations:

- To operate the Services and Sites, including to store and process your information through a third-party hosting services and to process payments;
- To contact you. For example, Sanctions Hub uses a third party's mailing platform to send you messages and updates from time to time;
- If Sanctions Hub believes that you have breached the Agreement or any other agreement with Sanctions Hub or abused your rights to use the Services or the Sites or performed any act or omission that Sanctions Hub believes to be violating any applicable law, rules, or regulations. Sanctions Hub may share your information with law

enforcement agencies, governmental agencies and other competent authorities as well as with other third parties, as may be required;

- If Sanctions Hub is required, or believes that it is required by law to share or disclose your information; In any case of dispute, or legal proceeding of any kind between you and Sanctions Hub, or between you and other users or third parties with respect to, or in relation with the Services or the Sites (including a dispute between User and Customer), Sanctions Hub can use your information in preparing its legal case in connection with such dispute or proceedings;
- In any case where Sanctions Hub believes that sharing information is necessary to prevent imminent physical harm or damage to property;
- If Sanctions Hub organizes the operation of the Services or the Sites within a different framework, or through another legal structure or entity, or if Sanctions Hub is acquired by, or merged with another entity it can share your information with the new entity who will operate the Services or the Sites, provided, however, that those entities agree to be bound by the provisions of this Privacy Policy, with respective changes taken into consideration;
- Sanctions Hub can also share personally identifiable information with sub-contractors and other companies or organizations connected, or affiliated with Sanctions Hub, such as subsidiaries, sister-companies and parent companies.

How does Sanctions Hub use anonymous, statistical or aggregated information?

Sanctions Hub may also use anonymous, statistical or aggregated information to properly operate the Services or the Services; to improve the quality and functionality of the Services or the Sites; to enhance your experience; to create new services, including customized services; to change or cancel existing content or services, and for other internal and statistical purposes.

Sanctions Hub can share, publish, post, disseminate, transmit or otherwise communicate or make available anonymous, statistical or aggregated information to suppliers, business partners, sponsors, affiliates and any other third party, at Sanctions Hub's sole discretion.

How does Sanctions Hub access & use your Google user data?

Sanctions Hub may use Google OAuth in order to get access to your Google data as describes as follows:

- As part of your registration to certain Services, you can choose to register using your Google account. As part of this process Sanctions Hub will create a Sanctions Hub

account using your Google e-mail address, and later on will use it as your system e-mail address.

- If you choose to synchronize your Google Calendar with a Service, Sanctions Hub will access your Google calendar and will use it to display your availability on your Sanctions Hub calendar(s).
- If you choose to synchronize your Google Contacts with a Service, Sanctions Hub will import your Google Contacts into Sanctions Hub's app.

How can you access your personal information?

If you are a Customer and registered to the Services or Sites, then you can access your personal account and edit or amend your personal information at any time by contacting us. If you find that your information is not accurate, incomplete or not updated, then you can submit a relevant request – please refer to “How to get in touch” section of this Privacy Policy.

Which ‘opt out’ and deletion options are available to you?

At any time you can opt out of Sanctions Hub's mailing lists, by sending Sanctions Hub a removal request – please refer to the “How to get in touch” section of this Privacy Policy. It can take up to ten (10) business days for your opt-out request to take effect.

If you wish to delete your personally identifiable information that is stored in Sanctions Hub's database, you can send a request to delete information – please refer to “How to get in touch” section of this Privacy Policy. Sanctions Hub will inform you whether it can accept your request. Sanctions Hub will strive to accept requests to delete personally identifiable information. Sanctions Hub can refuse your request, for example, if Sanctions Hub believes that removal of certain information can harm other users.

You will bear full responsibility for any damage, costs, fines and expenses resulting from the deletion of data pursuant to your request to exercise the right to be forgotten, and hold Sanctions Hub harmless thereof.

In any case, Sanctions Hub can keep any aggregated or anonymized information for statistical, marketing and other purposes, indefinitely.

It is Sanctions Hub's policy to keep Customer personal information on file unless specifically requested to be deleted.

How does Sanctions Hub secure your information?

Sanctions Hub and third parties on its behalf implement information security systems and procedures to secure your personal information. While such systems and procedures reduce the risk of security breaches, they do not provide absolute security.

Therefore, Sanctions Hub cannot guarantee that the Services or the Sites will be immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored therein and to other information security risks, or that your private communications on or through the Services or the Sites will remain private.

We restrict access to personal information you provided to Sanctions Hub or to our employees, contractors, vendors and agents who need to know that information for the purposes described in this Privacy Policy.

These individuals are obligated to keep your personal information confidential and they can be subject to penalties, termination of relations and criminal prosecution, if they fail to comply with such obligations.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Specific provisions for California residents

This section applies solely to Customers and Users of our Services who reside in the State of California.

The personal information that we collect

In the preceding twelve (12) months we have collected the following categories of personal information from users:

- Identifiers and personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as e-mail address and other contact and personal details.
- Commercial information, such as payment and transaction related personal information.
- Internet or other similar network activity information.
- Professional or employment-related information.
- Inferences drawn from other personal information.

Our categories of sources from for the personal

We obtain the categories of personal information listed above from the following categories of sources:

- Users and Customers of our Services.
- Services activities.

Our use and disclosure practices

We use the personal information that we collect or receive for the business purposes as described above under the section titled “What does Sanctions Hub do with your personally identifiable information?” of this policy.

We disclose personal information to third parties for business purposes as described above under the section titled “How does Sanctions Hub share your personally identifiable information with others?” in this policy.

In the preceding twelve (12) months we have disclosed the following categories of personal information for business purposes:

- Identifiers.
- Commercial information.
- Professional or employment-related information.
- Internet or other similar network activity.
- Inferences.

In the preceding twelve (12) months, we have not sold personal information.

Your rights as a California resident

You are entitled to the following specific rights under the California Consumer Privacy Act (‘CCPA’) in relation to your personal information:

Access to Specific Information and Data Portability Rights

You have the right to request that we will disclose certain information to you about our collection and use of your personal information over the past 12 months. After verifying your request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you;
- If we disclosed your personal information for a business purpose, we will provide you with a list which will identify the personal information categories that each category of recipient obtained.

Deletion Rights

You have the right to request that we delete any of your personal information. Upon confirmation of your request, we will delete your personal information from our records, unless an exception applies.

Exercising Your Rights

To exercise the access, data portability, and deletion rights described above, please submit your request to us – please refer to “How to get in touch” section of this Privacy Policy .

Only you or a person authorized to act on your behalf, may make a request related to your personal information.

A request for access can be made by you only twice within a 12-months period.

We cannot respond to your request or provide you with the requested personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use the personal information provided in your request to verify your identity or authority to make the request.

We will do our best to respond to your request within 45 days of its receipt. If we require more time (up to additional 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response by e-mail.

Any disclosures that we provide will only cover the 12-month period preceding receipt of your request.

The response we provide will also explain the reasons for our inability to comply with your request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such a decision and provide you with a cost estimate before processing further your request.

How does Sanctions Hub use cookies and other tracking technologies?

Sanctions Hub uses cookies when operating the Services or the Sites. Cookies are packets of information sent by Sanctions Hub's servers to your web browser and then sent back by the browser.

Sanctions Hub uses cookies for various purposes, for example, to save you the need to re-enter your password or otherwise authenticate each time you log-in to the Services or the Sites (where applicable), to facilitate the use of the Services or the Sites, to collect information for statistical and analytical purposes, to verify information, to customize the Services or the Sites to your personal preferences and for information security purposes.

Some of the cookies can expire when the session ends, and you exit your browser. Other cookies can be stored on your computer's hard drive. If you wish to block the cookies, then please use the help button in your browser and follow the necessary instructions. However, bear in mind that disabling cookies can complicate or even prevent your use of the Services or the Sites, or certain features thereof.

Sanctions Hub uses Google Analytics to collect information about the use of certain of the Services. Google Analytics collects information such as the frequency of visits to the Services, page views and other websites visited before using the Services. Sanctions Hub uses the information to maintain and improve the Services.

We may use the information collected through cookies to identify and authenticate visitors. We may also combine the information we collect with publicly available information, and with that of other users of the Website. For example, we may use your and other users' non-identifiable, aggregated data to improve the services we offer, for statistical analysis, and for other business purposes.

Google's ability to use and share information collected by Google Analytics about your visits to and use of the Sites and/or Services is governed by the Google Analytics Terms of Service. Please note that Google may use the collected information for their own purposes. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <https://www.google.com/policies/privacy/partners>. You may prevent your

data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, which is available at <https://tools.google.com/dlpage/gaoptout>.

Where is my personal information processed?

As a user of the Services or Sites, your personal information is maintained, processed and stored by Sanctions Hub, our affiliates, and our service providers in the USA or in other jurisdictions, at our discretion.

This Website and the Services is offered and available to users who reside in the United States or any of its territories or possessions. If you still decide to use our Website or Services and are in the European Economic Area, or in any other jurisdiction that regulates the transfer of personal information outside that jurisdiction, then you hereby grant Sanctions Hub your explicit and unambiguous consent to transfer your personal information to the USA or to any other jurisdiction where Sanctions Hub's hosting services operate, for the purposes described in this Privacy Policy. The countries in which we process personal information may not have the same data protection laws as the country in which you are located. We will protect personal information you disclose to us as described in this Privacy Policy.

Sanctions Hub cannot provide legal advice to Customers, but Sanctions Hub recommends that all Customers that create and maintain websites using Sanctions Hub platform or otherwise use the Services and/or Sites should maintain clear and comprehensive privacy policies complying with the applicable laws and regulations.

Job applications

Sanctions Hub collects applicants personal data solely for Sanctions Hub's internal recruitment purposes including for communication with applicants by phone or in writing, evaluation of applications and hiring process.

Enforcement

Sanctions Hub is doing its utmost to comply with this Privacy Policy. If you have any questions, concerns or complaints regarding this Privacy Policy and the enforcement thereof, contact us – please refer to “How to get in touch” section of this Privacy Policy.

After receiving your complaint, Sanctions Hub can contact you to better understand your concerns and will make all efforts to promptly answer your question or resolve your complaint to your full satisfaction.

Changes to this Privacy Policy

Sanctions Hub can change and update the terms of this Privacy Policy from time to time. Changes will take effect seven (7) days after their initial posting on the Sites or within the Services, unless Sanctions Hub amends this Privacy Policy to comply with legal requirements. In the latter cases the amendments will become effective as required or ordered.

The date this Privacy Policy was last revised is at the top of this page. You are responsible for periodically reviewing the Website and this Privacy Policy to check for any updates or changes.

How to get in touch

You can always contact us by using the “Contact Us” form on our website.