

Privacy Policy

Gridcore Solutions Ltd

Company Registration Number: 77559874

Registered under the Business Registration Ordinance (Chapter 30)

1. Introduction and Scope

Gridcore Solutions Ltd and its affiliated entities (**collectively, the “Company”, “Gridcore Solutions”, “we”, “us”, or “our”**) are committed to protecting the privacy and confidentiality of personal data in accordance with applicable data protection laws and regulatory standards.

This Privacy Policy sets out the principles and practices governing the collection, use, disclosure, storage, and protection of personal data obtained in the course of providing information technology, digital marketing, hosting, web development, domain services, and related professional services.

By accessing our websites, engaging our services, communicating with us, or otherwise providing personal data, you acknowledge that you have read and understood this Privacy Policy and agree to the processing of your personal data in accordance with the terms set out herein.

2. Definitions

For the purposes of this Privacy Policy, **“Personal Data”** means any information, whether true or not, that identifies or relates to an identifiable individual, whether directly or indirectly, including information held by the Company or by third parties on behalf of the Company.

3. Categories of Personal Data Collected

Depending on the nature of your relationship with the Company, we may collect and process the following categories of personal data:

- Identification information (e.g., name, national identification number, passport number, date of birth);

- Contact information (e.g., email address, telephone number, residential or business address);
- Business and professional information (e.g., job title, company name, corporate details);
- Technical and usage information (e.g., IP address, browser type, website usage logs);
- Financial and billing information (e.g., payment details, invoicing data);
- Employment-related information (for employees and candidates);
- Any other information voluntarily provided by you or lawfully obtained by the Company.

4. Legal Basis and Purpose of Processing

The Company collects, uses, and discloses personal data on one or more of the following legal bases:

- Your consent;
- Performance of a contract or pre-contractual measures;
- Compliance with legal or regulatory obligations;
- Legitimate business interests of the Company, provided such interests are not overridden by your rights.

Personal data may be processed for the following purposes:

- Provision, administration, and improvement of IT, marketing, hosting, and digital services;
- Identity verification, billing, and payment processing;
- Customer support, inquiries, and complaint handling;
- Marketing, newsletters, promotions, and business communications (subject to applicable consent requirements);

- Business operations, corporate governance, risk management, and compliance;
- Fraud prevention, security monitoring, and system integrity;
- Legal, regulatory, and audit requirements;
- Corporate transactions, including mergers, acquisitions, or asset transfers;
- Any other purpose reasonably related to the foregoing.

5. Disclosure of Personal Data

Personal data may be disclosed to the following categories of recipients where necessary and lawful:

- Affiliates and related entities within the Gridcore Solutions group;
- Service providers, contractors, and professional advisors (including IT vendors, hosting providers, marketing platforms, payment processors, auditors, and legal counsel);
- Financial institutions and payment service providers;
- Regulatory authorities, government agencies, or law enforcement bodies where required by law;
- Prospective buyers, investors, or assignees in connection with corporate transactions;
- Any other third party with your consent or as permitted by law.

All third parties engaged by the Company are required to implement appropriate safeguards and to process personal data in accordance with contractual and legal obligations.

6. Cross-Border Data Transfers

Where personal data is transferred outside the jurisdiction in which it was collected, the Company will ensure that appropriate safeguards are implemented in accordance with applicable data protection laws and international data transfer requirements.

7. Data Retention

The Company retains personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable laws, contractual obligations, or regulatory requirements. Personal data will be securely deleted or anonymized when it is no longer required.

8. Data Security Measures

We implement administrative, technical, and physical safeguards to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure. These measures include access controls, encryption, secure storage systems, and periodic security assessments.

9. Use of Cookies and Tracking Technologies

Our websites may use cookies and similar technologies to enhance user experience, analyze website performance, and support marketing activities. You may configure your browser to refuse cookies; however, certain website features may be unavailable if cookies are disabled.

10. Rights of Data Subjects

Subject to applicable law, you may have the right to:

- Request access to your personal data;
- Request correction of inaccurate or incomplete personal data;
- Withdraw consent for processing;
- Request deletion or restriction of processing;
- Object to certain processing activities;
- Lodge a complaint with a relevant data protection authority.

Requests may be subject to identity verification and applicable legal exemptions.

11. Marketing Communications

Where permitted by law, the Company may send marketing and promotional communications. You may opt out at any time by following the unsubscribe instructions or contacting us directly.

12. Third-Party Websites

Our websites may contain links to third-party websites. The Company is not responsible for the privacy practices or content of such third-party websites. Users are advised to review the privacy policies of those websites.

13. Updates to this Privacy Policy

The Company reserves the right to amend this Privacy Policy at any time. Updated versions will be published on our website and will take effect upon publication unless otherwise stated.

14. Contact Information

For inquiries, requests, or complaints relating to this Privacy Policy or personal data processing, please contact:

Email: services@gridcoresolutions.com

15. Data Governance, Compliance, and Oversight Measures

The Company implements and maintains governance measures to ensure compliance with applicable data protection laws and industry standards. Without limitation, the Company adopts the following practices:

a. Data Protection Impact Assessments (DPIA)

The Company shall conduct data protection impact assessments for processing activities that are likely to result in high risk to individuals, including but not limited to large-scale processing, profiling, monitoring, or processing of sensitive personal data. Such assessments shall be conducted prior to the commencement of the processing activity and reviewed periodically. The

Company shall document identified risks and implement appropriate mitigation measures.

b. Confidentiality Obligations

All employees, directors, officers, contractors, consultants, and third-party service providers with access to Personal Data shall be subject to strict confidentiality obligations. Such persons shall access and use Personal Data solely for authorized business purposes and shall not disclose Personal Data to any unauthorized party. Confidentiality obligations shall survive the termination of employment, engagement, or contractual relationship with the Company.

c. Personal Data Breach Response and Notification

The Company maintains internal procedures to detect, investigate, contain, and remediate personal data breaches. In the event of a personal data breach, the Company shall take reasonable and prompt steps to mitigate the impact of the breach and shall notify affected individuals and relevant regulatory authorities where required by applicable law. The Company shall maintain records of all personal data breaches and remedial actions taken.

d. Audits and Compliance Monitoring

The Company shall conduct periodic reviews and audits of its data protection practices and security controls. The Company shall implement corrective measures to address any identified non-compliance or deficiencies and shall update its policies and procedures as required to maintain compliance with applicable laws and regulatory requirements.

This Privacy Policy is governed by and construed in accordance with applicable data protection laws and the Business Registration Ordinance (Chapter 30).