

Data protection and data management policy

Data protection and data management policy applicable to the VIP Community operated by SEN World Group Fze (hereinafter referred to as: "SEN"). This policy constitutes an inseparable part of the General Terms and Conditions of the Contract ("GTCC").

1. The Client acknowledges and expressly accepts that the management of personal data of the Client by SEN is an essential prerequisite of the fulfilment of obligations arising out of the GTCC). By way of this policy, SEN informs the Client that the management of his personal data submitted by him voluntarily is performed by SEN in accordance with the international provisions of the act on the protection of personal data. SEN may use the above data exclusively for the identification of the Client and the verification of the legal and business capability of the Client, furthermore, to validate its rights and obligations set out in the GTCC and to make them accessible to the Offerors (Instructors) related to the Client, taking into account the legal limitations. By the establishment of these rules, the SEN has taken into consideration particularly Act VI of 1998 on Protection of Individuals during Automated Processing of Personal Data, and on the publication of the Convention issued in Strasbourg on the day of 28 January 1981; furthermore, the statutory provisions on the protection of personal data valid in the United Arab Emirates (UAE).

On the basis of the internationally applicable legislation and conventions, the SEN System pays special attention to basic principles aimed at the prevention of money laundering and countering terrorism financing (Council of Europe, FATF, OECD).

The purpose of this Policy is to ensure that on all fields of services provided by SEN, for all individuals, regardless of their nationality or place of residence, it is ensured that the individual's rights and fundamental freedoms, in particular their rights to privacy, are respected during the processing of their personal data (data protection).

Data management takes place via the server of SEN through a website coded by a strong (128-bit) SSL technology, thus it is guaranteed that your banking details will not be learned by unauthorized persons via the Internet.

Personal data: data which can be linked to a specified natural person (hereinafter referred to as: the "Stakeholder"), the conclusion deductible from data, related to the Stakeholder. Personal data shall keep their personal character during data management till their connection with the Stakeholder is retrievable.

Data management: independently of the applied procedure, it means the collection, recording, filing and utilisation of personal data (including data transmission and disclosure of data) and deletion of data. Under data management we mean also the modification of data and the elimination of their further utilisation.

Data manager: SEN World Group Fze.

Data processing: the process of carrying out data management operations and technical tasks, independently of the method and tool applied for the execution of operations, and the place of application;

Data processor: the natural person or legal entity, respectively, the organization with no legal status, which or who carries out the processing of personal data upon an assignment by the data manager;

Data deletion: an action during which data are made unrecognisable in a way that they are not retrievable any more;

Automated data file: series of data which become processed automatically;

Automated processing: it includes the following operations in case they are carried out partially or in full by automated tools: storage of data, logical or arithmetical operations made with the data, modification of data, deletion, retrieval and distribution.

2. The personal data of the Client are managed by SEN and the companies belonging to the SEN Group exclusively for the purposes of fulfilment of services related to the SEN System, the secure, continuous and flawless operation of the SEN System (thus particularly, for the purposes of identifiability within the SEN System and for the following purposes:

- Client identification

- operation and further expansion of the SEN System, in connection with administration related to purchases made by Partner companies; preparation of statistics, market research, market analyses; use for the purposes of reference, use for advertising purposes, technical operation of services and sending of information and newsletters related to this contract.

The legal basis of data management is the voluntary consent of the stakeholder, according to the local and international bases on the protection of personal data and the disclosure of information of public interest.

SEN shall not be authorized to transfer the personal data of the Client to any unauthorized third persons or make them available in any way. By signing the contract, the Client expressly agrees with the management and registration of their personal data provided and indicated by the Client in the contract or transferred to SEN in any other way, by SEN, for the purposes of their use for the operation of the System and during the fulfilment of other contractual obligations; furthermore, with their transfer to other - whether or not foreign - contractual partners or third persons to fulfil these and the above listed purposes. The Client expressly agrees that SEN will send marketing materials or other informational materials to him necessary for the operation of the System or facilitating it, to the telephone number and e-mail address of the Client indicated by him. The data manager shall not use the submitted personal data for purposes other than defined herein.

Any and all data shall be collected and processed exclusively in a fair and legal way. Any and all data shall be stored exclusively for specific and legal purposes, and shall not be used for purposes other than those. Data shall be proportionate to the purpose of their storage and shall comply with this purpose; they shall not exceed it. The method of data storage shall be a method which enables the identification of the data subject only for the period necessary for the purpose of storage. Appropriate safety measures shall be taken for the protection of personal data stored in the automated data files, too; in order to prevent the fortuitous or unauthorized annulment, or fortuitous loss, furthermore, any unauthorized access, modification or distribution.

3. SEN shall be authorized to provide the learned and processed personal and other data of the Client to the companies belonging to the SEN Group and to the Offerors (Instructors) related to the Client, exclusively for the purpose of fulfillability of services related to the SEN System. By signing this agreement, the Client expressly agrees that their data established according to the above and processed (primarily the master data and the other personal data necessary for the identification of the Client and for the justification of the legal basis of the previous data management) will be processed and managed by SEN and the companies belonging to the SEN Group also after the termination of this contract, for the above indicated purposes. Furthermore, it will transfer to business organizations - thus particularly, other companies operating a business system and having a contractual relationship or other business contact with SEN - and the Offerors (Instructors) referred to above. If, for these reasons, the Client forbids the forwarding of their data in writing, SEN shall not be authorized to forward the data. In this case, the Client acknowledges that the limitation of management of their data may prevent or restrict also the availability of Privileges available in the SEN System.

4. By signing this agreement, the Client expressly agrees that their above mentioned data may be used by SEN for advertising purposes, in particular, for sending short text messages (SMS) and e-mails. Client shall be authorized to request information on their personal data managed by SEN or ask for their correction, modification or change at any time, or even their deletion - if it is not restricted by the law. Client may send the above request for information concerning personal data or any other request to SEN to its official electronic address. SEN agrees to fulfil the request of the Client concerning their personal data as soon as possible, but latest in 30 days after the receipt of the request. The Client is aware of and expressly accepts that their request for the deletion of their personal data shall also constitute a declaration aimed at the termination of the contractual relationship of the Client. By signing this contract, the Client grants its preliminary consent - without any material compensation - to the use or presentation of photos or video recordings made by SEN during the SEN events organized for the Client, at other events of SEN or on the website of SEN or in any other way, unless the given photo or video clearly harms the good reputation or other personal rights of the Client.

SEN reserves the right to amend this data management policy at any time by its unilateral decision. After the amendment of the data management policy, all Clients must be properly informed (by way of a

publication on the Website). By the further use of the service the users shall acknowledge the modified data management rules, and there is no need for asking their separate consent to that.