

KOICONNECT LTD: Privacy Policy

Last updated: May 30, 2025

1. Introduction

Welcome to KOICONNECT LTD!

KOICONNECT LTD values your privacy and is committed to protecting your personal data.

This Privacy Policy ("Privacy Notice") explains how KOICONNECT LTD, including its licensors and affiliates ("Company", "we", "our", or "us"), collects, processes, and protects your information when you visit our website at <https://koiconnect.com> (the "Site"), use our services ("Services"), or interact with us in any other way, such as through social media.

This Privacy Notice outlines the types of personal data we collect from you, either directly or through your organization, as well as how we use and protect that data. It also details your rights regarding access, correction, and deletion of your personal information.

By using our Site or Services, you ("you", "your", "client", "client representative", "data subject") may be required to confirm your acceptance of this Privacy Notice.

For the purposes of this Privacy Notice, "personal data" refers to any information that can be used to directly or indirectly identify, contact, or locate you as a private individual ("Personal Data").

We process Personal Data in compliance with this Privacy Notice and applicable legislation, including the Cyprus Law on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data (Law 125(I)/2018) and the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), and any other relevant national data protection laws applicable to Company (collectively, "Data Protection Law")

This Privacy Policy forms part of our Company Terms of Service. Unless otherwise defined in this Privacy Policy, capitalized terms used in this Privacy Policy have the same meanings as in our Terms of Service.

2. Purpose and Scope. This Privacy Notice applies to all individuals whose data we process, including but not limited to:

- Website visitors without a contractual relationship with the Company
- Clients and their representatives or Ultimate Beneficial Owners (UBOs)
- Employees and independent contractors
- Users of our community platforms
- Vendors, suppliers, and service providers
- Job applicants and candidates
- Business prospects and leads
- Participants in events, surveys, webinars, or conferences

By accessing our Site, using our Services, or interacting with us, you acknowledge that you have read and understood this Privacy Notice and, where applicable, consent to the processing of your Personal Data as described herein.

3. Definition of Personal Data. For the purposes of this Privacy Notice, “**Personal Data**” refers to any information that identifies or can be used to identify a natural person directly or indirectly. This may include, but is not limited to:

- Name, email address, telephone number
- Identification numbers (e.g., national ID, tax ID, passport)
- IP address, device and browser information
- Employment or business affiliation
- Financial and payment information
- Any other data you voluntarily provide when using our Website or Services

4. Information Collection. Company collects and stores certain information about you. This information can be used on its own or in combination with other information to identify you ("Personal Information"). Below is a list of types of Personal Information that we may collect and use about you.

Categories of Personal Information	Description
Contact	Information we use to contact you including physical addresses, e-mail addresses, and phone numbers
Identification	Information we use to identify you including full name, government ID, passport, DoB, and selfie
Financial	Information about an individual's financial account including bank account details, payment card details
Transactional	Information about the transactions you carry out and the payments to and from your accounts with us including amounts and dates
Contractual	Information about the products or services we provide to you
Locational	Information we get about where you are, including country and IP address. This may come from your mobile phone or the place where you connect a computer to the internet. It may also include locations where you used your card.

Categories of Personal Information	Description
Usage	Information about the usage of our Services and Site including metadata
Technical	Information on the devices and technology you use including IP address, login data, browser type and version, timezone, operating system, browser type
Communications	Information from communications between us including any personal data you may share with us in your messages, communication metadata
Professional	Information about professional career and educational background including current and old job positions, degrees, qualifications
Public and third-party records	Information about you that is in public records and information about you that is publicly available on the internet. We also collect information about you which we receive from other companies, such as (without limitation) credit reference or fraud protection agencies (see below for more information).
Consents	Any permissions, consents or preferences that you give us
Company Community Platform Content	The Company Community allows you to post or transmit comments, computer files, messages, and other materials. This content may include personal data
Biometric data	To automatically verify your identity and prevent fraud, we may use your biometric data. Specifically, we may collect a photo of you (a selfie) along with government-issued identification. Using facial recognition technology, the information from your photo is matched against the information on your identification document.

Categories of Personal Information	Description
Other Information	Any other information you choose to provide to us through all available channels, participating in user/customer surveys or otherwise visiting and interacting with our Site and/or Services.

For the avoidance of doubt, Personal Information shall not include any personal information which is anonymized, after which the identifiable data is destroyed. Company may also collect and use non-Personal Information to analyze the effectiveness of our Services and to improve our Services. We may collect non-Personal Information through the Services, the Site and through cookies.

5. Sources of Your Personal Data. We may collect Personal Data about you or your business from a variety of sources, including:

- **Directly from You:** When you use our Services, complete a contact form, request marketing communications, participate in surveys, or otherwise communicate with us.
- **Automatically Through Your Use of Our Website or Services:** We collect usage and profile data when you interact with our Website and/or Services. This includes, but is not limited to, your login credentials, browser or app settings, marketing preferences, and information from the devices and browsers you use to access our platform. This information helps us deliver and improve our Services.
- **Through Cookies and Similar Technologies:** We use cookies and other tracking technologies to collect data during your visit to our Website or use of our mobile applications. For further details, please refer to our [Cookie Policy].
- **From Third Parties:** We may receive Personal Data about you from various third-party sources, including:
 - Companies, business partners, or individuals who refer or introduce you to us.
 - Business partners, service providers, subcontractors, advertising networks, analytics providers, search information providers, fraud prevention services, and Payment Service Providers (PSPs) who assist with identity verification, security, service enhancement, and business protection.
 - Social media platforms and other online platforms, for example when you interact with our advertisements on Google or Facebook.
 - Publicly available sources, such as national company registries or other government databases.
 - Market research firms.
 - Government authorities, law enforcement agencies, regulators, or other public authorities, where permitted by law.

6. Cookie Use. For detailed information about how we use cookies and similar technologies, please refer to our [Cookie Policy].

7. Information Use. Below is a list of the ways that we may use your Personal Information together with the legal basis of processing, where applicable under data protection law.

Purposes for which we use your Personal Information	Legal basis	Individuals
Management of the contractual relationship with you to provide you with our Services	<ul style="list-style-type: none"> • Performance of the contract • Compliance with our legal obligations 	<ul style="list-style-type: none"> • Clients • Independent Contractors • Suppliers
<p>Improving our business by</p> <ul style="list-style-type: none"> • Improving our services and operations • Developing new ways to meet our customers' needs and grow our business • Analyzing and studying how our customers use products and services from Company 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interest <p>Our legitimate interest is centered around enhancing the quality of our Services, optimizing operational efficiency, and maintaining a competitive edge in the market</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors • Company community platform users • Suppliers • Prospects
Secure access to our Services, including but not limited to performing the necessary identification and verification of our users prior to granting access to our Services	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interest • Consent <p>Our legitimate interest is to safeguard access to our Services to authorized only users who have gone through identification and verification processes</p>	<ul style="list-style-type: none"> • Clients • Independent Contractors

Purposes for which we use your Personal Information	Legal basis	Individuals
Marketing and events-related communications, including but not limited to inviting you to participate in events, surveys, providing personalized content through advertising campaigns or otherwise communicating with you for marketing purposes to promote our Services	<ul style="list-style-type: none"> • Consent • Legitimate interest <p>Our legitimate interest is to tailor our marketing communications to the preferences and interests of our audience and provide a personalized and engaging experience for our customers</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors • Company community platform users • Prospects • Participants of webinars, conferences, trade events, surveys etc.
<p>Recruitment:</p> <ul style="list-style-type: none"> • Posting and managing jobs • Sourcing candidates • Managing applicants • Scheduling interviews 	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interest <p>Our legitimate interest is to assess candidates' qualifications and suitability for available positions and to maintain a pool of potential candidates for future opportunities</p>	<ul style="list-style-type: none"> • Candidates
Protect the security or integrity of us, our Site and our Services	<ul style="list-style-type: none"> • Legitimate interest <p>Our legitimate interest is to maintain the reliability and availability of our services by</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors

Purposes for which we use your Personal Information	Legal basis	Individuals
	<p>conducting identity verification, detecting and preventing security threats, fraud, money laundering and other crime, unauthorized access, risk and other activities that could harm our business, Site, or Services.</p> <ul style="list-style-type: none"> • Legal Obligation • Performance of the contract 	<ul style="list-style-type: none"> • Company community platform users • Suppliers • Prospects • Participants of webinars, conferences, trade events, surveys etc.
Communicate with you about our Site and Services, such as to notify of changes and updates and to provide you with customer support and troubleshooting	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interest <p>Our legitimate interest is grounded in our commitment to delivering a seamless and informative user experience and to provide assistance when needed</p>	<ul style="list-style-type: none"> • Visitors of the Site • Clients • Independent Contractors • Company community platform users • Prospects
To manage our business operations including but not limited to delivering Company's products and services, making and managing payments, managing fees and charges due on user accounts and debt collection	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interests <p>Our legitimate interests to manage our business operations efficiently, deliver our products and services, and ensure the</p>	<ul style="list-style-type: none"> • Clients • Independent Contractors • Suppliers

Purposes for which we use your Personal Information	Legal basis	Individuals
	financial stability of our company	
Meet our legal, regulatory, and tax reporting obligations	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • Clients • Independent Contractors • Suppliers
To provide and maintain the Company Community Platform	<ul style="list-style-type: none"> • Performance of the contract • Legitimate Interest <p>Our legitimate interest to ensure that the online platform operates smoothly and effectively to provide the services or features it offers to users</p>	<ul style="list-style-type: none"> • Company community platform users
Aggregating pseudonymized personal data and reporting anonymized salary data for the purpose of compensation benchmarking in various industries and geographies as well as for academic research purposes	<ul style="list-style-type: none"> • Consent • Performance of a contract • Legitimate interest <p>Our legitimate interest in making informed decisions about compensation strategies, remain competitive, and attract and retain talent as well as benefiting society by advancing the knowledge in fields related</p>	<ul style="list-style-type: none"> • Workers

Purposes for which we use your Personal Information	Legal basis	Individuals
	to compensation, labor markets, and HR practice	

In cases where we need to process personal data for the performance of the contract with you or as required by law and you refuse to provide your information, we may not be able to perform the contract with you and consequently, we may not be able to provide certain services to you.

8. Communications. We may contact you with newsletters, promotional materials, and other marketing communications that may be of interest to you. You may opt out of receiving these communications at any time by clicking the “unsubscribe” link in the email, following the instructions provided in our messages, or contacting us directly. Please note, however, that even if you opt out of marketing communications, we may still send you non-marketing communications related to your use of the Services. These may include service updates, administrative messages, transaction confirmations, or other important notices.

9. Information Sharing with Third Parties. We do not sell or trade your Personal Information to third parties. We only share your information with trusted parties in the manner described below, and always for the limited purposes outlined in the “Information Use” section of this Privacy Policy, unless otherwise disclosed at the time of collection:

- **Clients:** Where you are providing services to a client through our platform, we may share your Personal Information with that client.
- **Service Providers and Partners:** We may share your Personal Information with trusted third-party agents, suppliers, and service providers that help us operate our business and deliver the Services. These may include:
 - Website and data hosting providers
 - Cloud-based software vendors
 - IT service providers
 - Identity verification providers
 - Customer support partners
 - Payment processors and financial institutions
 - Legal, auditing, and insurance professionals

These parties are contractually obligated to use your information only for the purposes specified in their agreement with us and must maintain its confidentiality and security.

- **Regulatory and Legal Authorities:** We may disclose your Personal Information to government bodies, law enforcement agencies, regulatory authorities, or other legally authorized entities where required to do so by applicable law or regulation, or where such disclosure is necessary to:
 - Comply with legal obligations
 - Protect our business or users

- Enforce our legal rights
- **Business Transfers:** If we undergo a merger, acquisition, restructuring, or sale of assets, we may transfer your Personal Information to the acquiring entity, provided such entity agrees to be bound by the terms of this Privacy Policy.
- **Academic and Research Institutions:** We may share de-identified information with academic institutions for research purposes. Such disclosures are subject to strict confidentiality agreements, and only aggregated, anonymized data is used in research findings.
- **Public Reporting:** From time to time, we may publish reports that include anonymized, aggregated statistics or insights derived from Personal Information.
- **Affiliates:** We may share your Personal Information with our current or future affiliates for purposes consistent with this Privacy Policy.
- **Marketing Partners:** We may share your Personal Information with advertising partners (such as social media platforms) to help deliver targeted marketing content that aligns with your interests.
- **With Your Consent:** We may share your Personal Information with third parties in any other way, but only where you have given us your explicit consent to do so.

10. Automated Decision-Making and Profiling. We do not engage in decision-making based solely on automated processing of your Personal Information, including profiling, that produces legal or similarly significant effects on you. All decisions related to the provision of Services or processing of your data involve meaningful human review to ensure your rights and interests are protected.

11. Retention of Your Personal Information. We retain your Personal Information only for as long as necessary to fulfill the purposes for which it was collected, in accordance with applicable laws and our internal data retention policies. This includes retaining your data to:

- Comply with legal or regulatory obligations
- Resolve disputes
- Enforce our contractual rights
- Conduct internal research and business analysis

To determine the appropriate retention period, we consider the nature, scope, and sensitivity of the data, the purposes for processing it, and whether those purposes can be achieved through other means. For information about specific retention periods related to services we provide, please refer to our Data Processing Addendum.

12. Security. We are committed to protecting your Personal Information. To prevent unauthorized access, disclosure, alteration, or destruction of your data, we implement appropriate technical and organizational security measures. These include protections against internal and external threats and limiting access to Personal Information on a strict need-to-know basis. Authorized personnel are required to process Personal Information only in accordance with our instructions and are bound by confidentiality obligations.

If you have chosen a password or other access credentials to use the Company platform, you are responsible for maintaining their confidentiality. You must not share your login information with anyone else and should take reasonable precautions to secure your access.

Please note that while we take reasonable steps to protect your data, no method of electronic transmission or storage over the Internet is entirely secure. As such, we cannot guarantee the

absolute security of your Personal Information. You play a crucial role in protecting your data. If you become aware of any security or data breach, please notify us immediately at info@koiconnect.com.

13. International Transfers. Your Personal Information may be transferred to, and stored on, servers located in countries outside your jurisdiction, including locations where data protection laws may be less stringent than those in your home country. If you are located outside the Republic of Cyprus and choose to provide us with your information, please be advised that your data may be transferred to and processed in the Republic of Cyprus, where our operations are based. Where required, we implement safeguards, such as standard contractual clauses or similar legal mechanisms, to ensure that your Personal Information remains protected when transferred internationally.

By using our Site and Services, you acknowledge and consent to the transfer of your information to jurisdictions outside your country of residence, including the Republic of Cyprus and any other country where we or our service providers maintain operations.

14. Third-Party Advertising, Links, and Content. Our Site may contain links to third-party websites or services that are not operated or controlled by us. We are not responsible for the content, privacy practices, or terms of use of such third parties. We strongly recommend that you review the privacy policies of any external sites you visit.

We also permit third parties, including advertising networks and analytics providers, to collect information about your browsing behavior through cookies, tracking pixels, and other technologies. These third parties may use this data to serve targeted advertisements tailored to your interests across websites and devices. Some of these third parties participate in industry-wide self-regulatory programs that allow users to opt out of targeted advertising. You can learn more about these programs and opt out of interest-based advertising by following the procedures outlined in the "**Your Rights**" section of this Privacy Policy.

We process your data for targeted marketing purposes only with your explicit consent or where we have a legitimate interest in personalizing and enhancing your experience. You have the right to object to the processing of your Personal Information for direct marketing at any time.

15. Children's Privacy. We do not knowingly collect Personal Information from individuals under the age of 18. Our Website and Services are not directed to minors. If you are a parent or guardian and become aware that your child has provided us with Personal Information, please contact us immediately. Upon becoming aware that we have collected Personal Information from a child under 18 without verifiable parental consent, we will take prompt steps to delete such information from our records.

16. Your Rights. Subject to applicable data protection laws, you may have the following rights regarding your Personal Information:

- To access a copy of your Personal Information and obtain information about how we process it;
- To correct or update any inaccurate or incomplete Personal Information;
- To request the deletion of your Personal Information where it is no longer necessary for the purposes for which it was collected or processed;

- To request that we restrict the processing of your Personal Information in certain circumstances;
- To object to our processing of your Personal Information where we rely on legitimate interests as the legal basis for processing;
- To object to decisions based solely on automated processing, including profiling;
- To receive your Personal Information in a portable format or to have it transferred directly to another data controller, where technically feasible;
- To withdraw any consent you have given for processing your Personal Information at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

You also have the right to lodge a complaint with a relevant supervisory authority if you believe your data protection rights have been violated.

To exercise these rights, please contact us at **info@koiconnect.com**. We may require additional information to verify your identity and protect your privacy before processing your request.

If you wish to make a request on behalf of another individual, you must provide valid authorization to do so.

We reserve the right to charge a reasonable fee if permitted by law, and to refuse requests that are manifestly unfounded, excessive, or would infringe on the privacy rights of others.

Certain Personal Information may be retained for a limited time as required by law or for legitimate business purposes such as record-keeping, accounting, and fraud prevention.

Please note that some rights may be exercised directly through your account if you are a registered user of the Company platform.

17. Changes to This Privacy Policy. This Privacy Policy is effective as of the date indicated at the top of this document and remains in effect until updated.

We reserve the right to modify or update this Privacy Policy at any time. Changes will take effect immediately upon posting on this page. Your continued use of our Website or Services after any updates constitutes your acceptance of the revised Privacy Policy.

We encourage you to review this Policy periodically to stay informed of any changes.

18. Contact Information. If you have any questions or concerns regarding this Privacy Notice, please contact us at:

KOICONNECT LTD

Company Number: HE464213

Address: Kallipoleos, 3, GEOGAS TOWER, Flat/Office 102, 1055, Nicosia, Cyprus

Email: info@koiconnect.com