

General Data Protection Regulation

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1. Introduction

1.1 Pica Trebax Inc., a legal entity organized and existing under the laws of New Hampshire, having its registered office at 71 Spit Brook Rd. Suite 308, Nashua, NH 03060, USA (**hereinafter** referred to as the “**Company**”).

1.2 The Company, *inter alia*, carries out activities, including the provisions of goods and/or services, to the European Economic Area (hereinafter referred to as the “**EEA**”) and Switzerland, in this respect compliance is required with the EU General Data Protection Regulation 2016/679 (hereinafter referred to as the “**GDPR**”), and therefore any individual located in the EEA and Switzerland has additional rights pursuant to the GDPR, as there as set out herein.

1.3 This Privacy Notice Policy (hereinafter referred to as the “**Privacy Notice**”) is issued pursuant to and reflects compliance with the requirements and/or obligations and/or duties introduced by the, in relation to all processing activities carried out by the Company in respect of your Personal Data pursuant to GDPR if your are located in the EEA and Switzerland and to the California Consumer Privacy Act of 2018 if you are located in California.

2. Scope and Objective of the Privacy Notice

2.1 The Company respects individuals’ rights to privacy and the protection of Personal Data. The scope of this Privacy Notice is to explain and elaborate on how we collect, use, process and store your Personal Data in the course of our business.

2.2 “Personal Data” or “**Data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.3 The Company may update the Privacy Notice from time to time. When we make any updates, we will communicate such updates to you and publish the updated Privacy Notice on our website <http://www.Engre.co>

2.4 We would encourage you to visit our website regularly to stay informed about the purposes of processing of your Personal Data and your rights to control how we collect, use or process your Personal Data.

3. The Personal Data we process

3.1 We collect, use and process various categories of Personal Data at the start of, and for the duration of, your business relationship with us as well as after the termination of our business relationship. The Company will limit the collection and processing of Personal Data to the necessary Data to meet the purpose and legal basis as described in the Section 5 of this Privacy Notice.

3.2 Personal Data may inter alia, include:

- a.** Basic Personal Data, including but not limited to name, email, IP address;
- b.** Employment status information including the industry of employment and position of employment;
- c.** Visual images including but not limited to copies of passports, identity cards and driver's license;

3.5 Subject to applicable law, the Company may process Personal Data about criminal convictions or offences and/or alleged offences for specific and limited activities and purposes including but not limited to perform checks to prevent and detect crime and comply with the Law relating to anti-money laundering and terrorist financing, fraud, bribery, corruption and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing Data with financial organisations, competent or other authorities including non-governmental authorities in any jurisdiction within or outside the EEA. Where we are required to do so under any applicable anti-money laundering framework.

4. How Personal Data is collected

4.1 Your Personal Data is collected:

- a. From you;
- b. From third parties who provide services to you established or located within and/or outside the EEA (e.g. lawyers);
- c. from our business partners or agents;
- d. Credit reference and fraud prevention agencies, banks or other financial institutions, third authentication service providers and the providers of public registers;
- e. During our business relationship with you;
- f. From publicly available sources including the press, company registers and online search engines;
- g. Through the use of Cookies, Beacons and/or Third Party Services.

4.2 Cookies, Beacons and Third Party Services are defined as follows:

Cookies

Cookies are text files put on your computer to collect standard internet log information and visitor behavior information. This information is then used to track visitor use of the website and to create statistical reports on website activity. A cookie may also convey anonymous information about how you browse the Website to us. A cookie does not collect Personal Information about you.

You can set your web browser or device to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Services may not function properly if the ability to accept cookies is disabled.

Beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. We only use web beacons in accordance with applicable laws. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Services, to monitor how our Users navigate the Services, or to count how many particular articles or links were actually viewed

Third Party Services

We may provide an option to access or register for Services through the use of your user name and passwords for certain services provided by third parties (each, an “**Third Party Services**”), such as through the use of your Facebook, LinkedIn, or Google account. By authorizing us to connect with a Third-Party Services, you authorize us to access and store

the information that the Third-Party Services makes available to us, and to use and disclose it in accordance with this Policy. It is your responsibility to check your privacy settings for such Third-Party Services (please review the terms of use and privacy policy of such Third-Party Services) to control what information is available to us.

4.2 It is your duty and responsibility to provide us with updates as to the Personal Data provided in order for such Data to remain current, accurate and correct and you acknowledge that we rely on the Personal Data provided to us in carrying out our obligations, under any applicable law and our business relationship with you.

4.3 Where you are a corporate entity providing to us Personal Data of any individual or where you are an individual providing us with Personal Data of any individual other than yourself, you hereby undertake and represent that such individual, whose Personal Data is collected, used, processed and stored in accordance with this Privacy Notice, has been fully informed of and clearly consented in writing to such collection, use, processing and store of his/her Personal Data under this Privacy Notice and that he/she has been informed of his/her rights in relation to the Personal Data which is collected, used, processed and stored, under this Privacy Notice.

5. Purpose of Processing and legal basis of processing of your Personal Data

5.1 We would like to ensure that you fully understand the purpose and the legal basis of collecting, using, processing and storing of your Personal Data. Thus, in this Section we will describe the purposes for which your Personal Data may be used as well as the legal basis of processing of your Personal Data.

5.A Purpose of processing

5.A.1 We will only collect, use, process, store, share or transfer your Personal Data where it is necessary for us to carry out our lawful business activities and provide our services. We will process your Personal Data for the purpose of or in connection with the provision of professional services to you, for performance of our security, quality and risk management activities, and for compliance with our legal obligations.

We set out below in further detail the legal bases on which your Personal Data is being processed.

5.B Legal Basis of processing of your Personal Data

We have described the legal basis for which your Personal Data may be used in detail below:

5.B.1 Performance of a Contract/Contractual necessity

5.B.1.1 We may process your Personal Data where it is necessary to enter into a contract with you for the provision of our services or to perform our obligations or duties under such contract.

5.B.1.2 On the basis of contractual necessity we may collect, use, process and store Data such as name of the client and date of birth.

5.B.1.3 Please note that if you don't agree to provide us with the Data required on the basis of contractual necessity we may have to suspend or terminate the services provided to you.

5.B.2 Legal and Regulatory Obligations

5.B.2.1 When you establish a business relationship with us in order to provide you with our services, throughout your relationship with us and after the termination of your business relationship with us, we are required by the law to collect, use, process and store certain Personal Data about you.

This may include Personal Data necessary:

- a.** To comply with any and all legal and/or regulatory obligations whatsoever under the laws and regulations, in any jurisdiction within or outside the EEA;
- b.** To be used in the courts, law enforcement agencies, regulatory agencies, and other public or competent or tax authorities or other authorities, governmental or not, in any jurisdiction within or outside the EEA;

- c. To carry out checks in relation to anti-money laundering and terrorist financing, bribery, fraud, and/or sanctions whatsoever as required by any laws and regulations within or outside the EEA;
- d. To protect our rights, privacy, safety or property whatsoever;
- e. To be used for the prevention, detection or investigation of crimes whatsoever.

5.B.2.2 The Company may collect, use, process and store Personal Data such as, name of the client including the names of the directors, shareholders and ultimate beneficial owners (in case of a corporate client) to comply with the legal and/or regulatory obligations.

5.B.2.3 Please note that if you don't agree to provide us with the Data required to meet our legal and/or regulatory obligations we may have to suspend or terminate the services provided to you.

5.B.3 Legitimate interests of the Company

5.B.3.1 We may collect, process, use, and store your Personal Data where it is in our legitimate interests and without prejudicing your interests or fundamental rights and freedoms.

5.B.3.2 We may process your Personal Data to manage our business, financial affairs as well as to protect our employees, clients and property. It is in our interests to ensure that our processes and systems operate effectively and that we can continue operating as a business.

5.B.3.3 This may include processing of your Data to:

- a. Monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;

- b.** Ensure business continuity and disaster recovery responding to information technology and business emergencies;
- c.** Ensure network and information security, including but not limited to monitoring authorised users' access to our information technology for the purpose of preventing cyber-attacks, unauthorised use of our telecommunications, trading or other systems and websites, prevention or detection of crime and protection of your Personal Data;
- d.** Provide assurance on the management of the Company's material risks;
- e.** Perform general, financial and regulatory accounting and reporting;
- f.** Protect our legal rights and interests.

5.B.3.4 It is in the Company's interest to ensure that it provides you with the most appropriate services.

5.B.3.5 This may require processing of your Data to enable us to:

- a.** Understand your actions, behaviour, preferences, expectations, feedback and financial history in order to improve our services, develop new business opportunities and services, and to improve the relevance of the services offered;
- b.** Monitor and improve the performance and effectiveness of services.

5.B.3.6 On the basis of legitimate interest we may collect, use, process and store Data such as copy of a Bank reference letter.

5.B.3.7 Please note that if you don't agree to provide us with the Data collected, used, processed and stored on the basis of the legitimate interest we may have to suspend or terminate the services provided to you.

5.B.4 Consent

5.B.4.1 For special categories of data as well as for research, statistical or marketing purposes we may only collect, use, process and store Personal Data where an explicit consent has been granted.

5.B.4.1 On the basis of Consent we may collect, use, process and store Data e.g. for marketing purposes.

6. Your rights

6.1 The Company takes all the appropriate measures to make sure that you are fully informed

6.2 As a result, all rights and the circumstances under which such rights may be exercised are described in the table below. In the event you wish to exercise any of the rights described below or if you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Notice please contact at support@engre.co .

Rights	Explanation
Access – You have the right to access to your Personal Data including the records of any and all email and/or text message correspondence, between you and the Company, held by the Company.	Specifically, you have the right to enquire as to whether we process any Personal Data of yours as well as which Personal Data is processed and the manner of such processing. You have the right to receive a copy of your Personal Data without any charge. If you would like a copy of your Personal Data held by the Company, please contact us at support@engre.co
Rectification – You have a right to rectification of inaccurate Personal Data and to update incomplete Personal Data.	In case you believe that any of the Personal Data held by the Company is inaccurate, you are entitled to request to restrict the processing of that Personal Data and rectify the inaccuracies.
Erasure – You have a right to request that your Personal Data be deleted.	You may request to delete your Personal Data in case you believe that: the Company no longer needs to process your Personal Data for the purposes for which it was provided; the processing is based on your consent which you withdraw; the processing of your Personal Data is unlawful; your Personal Data must be processed for reasons of compliance with legal obligations; your Personal Data is being processed pursuant to a legitimate interest of the Company or a third party and you

	<p>object to such processing and we (or the third party as the case may be) do not have an overriding legitimate interest.</p> <p>You may exercise this right by contacting us at support@engre.co</p>
<p>Restriction – You have a right to request that we restrict the processing of your Personal Data.</p>	<p>You may request us to restrict processing your Personal Data where:</p> <p>we are investigating whether any of your Personal Data held by the Company is inaccurate;</p> <p>the Company no longer needs to process your Personal Data for the purposes for which it was provided, but you require such Data to establish, exercise or defend legal proceedings;</p> <p>your Personal Data is processed in an unlawful manner and you chose to exercise the right to restrict processing instead of your right to deletion as set out above;</p> <p>for a period enabling us to verify whether any legitimate interest on which we are relying for the processing of your Personal Data overrides your interest.</p> <p>You may exercise this right by contacting us at support@engre.co</p>
<p>Portability – You have a right to data portability.</p>	<p>You have the right to receive your Personal Data or to request that we transmit such Personal Data to another third party (where this is technically feasible) in a structured, commonly used machine-readable format where the processing is based on your consent or pursuant to our contract with you or where processing is carried out by automated means. Where you request that we provide such Data directly to third parties, the Company shall not be responsible for any such third parties' use of your Personal Data, which will be governed by their agreement with you and any privacy statement they provide to you.</p> <p>You may exercise this right by contacting us at support@engre.co</p>
<p>Objection – You have a right to object to the</p>	<p>You have a right to object to us processing your Personal Data for marketing purposes or on the basis of the</p>

<p>processing of your Personal Data.</p>	<p>legitimate interest as described in the Section 5 of this Privacy Notice– unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or for the establishment, exercise or defence of legal claims.</p> <p>The Company may need to restrict or cease processing your Personal Data altogether or, where requested, delete your information.</p> <p>Please note that if you chose to exercise this right, we may have to suspend or terminate the services provided to you.</p>
<p>Withdraw consent – You have a right to withdraw your consent.</p>	<p>In case in which the Company relies on your consent to process your Personal Data (including Personal Data falling under the special categories), you have a right to withdraw your consent at any time by sending a written request at support@engre.co</p>
<p>Raise a complaint</p>	<p>If you wish to make a complaint, you can contact our Data Protection Officer who will investigate the matter.</p> <p>We expect to be fully able to address any concerns you may have directly in the first instance; however, we would like to inform you of your right to lodge a complaint with the relevant supervisory authority in your country of residence, or your place of work or the place where the alleged infringement has taken place.</p>
<p>Not be subject to automated decision-making processing (including profiling) – You have the right not to be subject to automated decision making.</p>	<p>You have the right not to be subject to a decision, based solely on automated processing of Personal Data. At this point, the Company does not have in place any automated-decision making in respect of your Personal Data.</p>

7. Changes to the way we use your Personal Data

7.1 The Company reserves the right to change the way and/or the purpose of processing and use of your Personal Data. As a result, where the Company decides to process or use your Personal Data for purpose other than the purpose for which such Personal Data were initially collected, processed and used and stored, it shall provide you with all relevant information of such change including the new purpose under which such Personal Data will be used and/or processed as well as all of your rights as described in the Section 6 of this Privacy Notice.

8. Communications about your Personal Data

8.1 We may directly contact you to provide you with information in regards with the status, operation and maintenance of your Personal Data including updated information about how we collect, use, process and store your Personal Data by email.

9. How we use and share Personal Data

9.1 We will only use and share your Personal Data where it is necessary for us to lawfully carry out our business activities and/or provide our services. Your Personal Data may be shared with and used, processed and stored by subsidiaries and/or other group companies.

10. Sharing with third-parties

10.1 We may share your Personal Data with the following recipients and categories of recipients:

a. Third party organisations that provide applications, data processing or IT services to the Company including cloud-based software, identity management, web-hosting, data analysis, security and storage services.

- b.** Other third-party service providers and processors, including indicatively, network advertisers, ad agencies, analytics service providers, file storage services and companies providing background checks.
- c.** Insurers and professional advisors including legal advisors
- d.** Law enforcement and other government and regulatory agencies and other third parties as required under applicable law.

10.2 We may share your Personal Data with third parties in the following cases:

- a.** Where we have your explicit and written consent;
- b.** It is required for your service;
- c.** Where it is requested by any Competent or any other authority having control or jurisdiction over the Company or you or your associates whatsoever or in whose territory the Company has clients;
- d.** In collaboration with Competent authorities to investigate or prevent fraud, money laundering or other illegal activity;
- e.** In collaboration with credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check your details supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
- f.** With any of the Company's professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such Data and commit to the confidentiality obligations herein as well;
- g.** With other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use your Personal Data or get in touch with you;
- h.** With successors or assignees or transferees or buyers, with five (5) Business Days prior written notice to you;
- i.** With such third parties as we see fit to assist us in enforcing our legal or contractual rights against you including but not limited to debt collection agencies and legal advisors. You acknowledge that any of the persons listed in the previous sentence may be either within or outside the EEA;

j. It is required by the law and by law enforcement agencies, judicial bodies, the financial ombudsman, government entities, tax authorities or regulatory bodies and/or other competent authorities, governmental or not, whatsoever, established or located within or outside the EEA;

k. With software, platform support or cloud hosting companies.

10.3 Our third-parties to which we share and/or transfer your Personal Data are not allowed to use or disclose or share whatsoever for any other purpose other than the purpose to provide services, as agreed, to us.

10.4 We will not disclose to any third party your Personal Data for its own marketing purposes without your consent.

10.8 Please note that your Personal Data is shared, transferred, collected, processed and stored in the following countries (EEA and non-EEA): USA.

10.9 If you would like a copy of your Personal Data held by the third parties or if you want to receive more details on how your Personal Data is collected, used, processed or stored by the third parties please contact us at support@engre.co.

11. Transferring Information to third countries

11.1 If you are located in the EEA and Switzerland we may share or transfer your Personal Data with recipients in non-EU where:

a. the European Commission has decided that the country or the organisation we are sharing your Personal Data with will protect your Data adequately;

b. the transfer has been authorised by the relevant data protection authority;

c. we have entered into a contract with the organisation with which we are sharing your Personal Data (on terms approved by the European Commission or the Data Protection Commissioner of the organisation's jurisdiction) to ensure your Personal Data is adequately protected.

12. Notifications

12.1 We may provide you with any notifications or updates in regards with corporate or tax matters or notifications about matters related to the services which we provide to you. You have the right to request that we do not make such communications by written request at support@engre.co.

13. How long we store your Data

13.1 We retain the Personal Data processed by us for as long as we consider necessary for the purpose for which it was collected, as required and/or as required under any legal provision to which we are subject and/or for such other periods as can be lawfully justified in each case.

13.3 Documentation gathered by us in accordance with our obligations under money laundering legislation, tax legislation or any other legislation to which we are subject is maintained for as long as such legislation requires after the termination of our business relationship or a one-off transaction. Such records will be retained for such period as is required under the relevant money laundering, tax or other legislation to which we are subject, as this may be amended from time to time.

13.4 Personal data may be held for longer periods where extended retention periods are required by any applicable law or regulations and/or in order to establish, exercise or defend our legal rights before a Court or tribunal or Arbitral tribunal whatsoever.

14. Security information

14.1 We are committed to ensuring that your Personal Data is secure. For more information about the steps we are taking to protect your Personal Data please contact us at support@engre.co

14.2 In the event of any loss or destruction or other form of personal data breach in respect of your Personal Data which is likely to result in a high risk to your rights and freedoms, we will contact you on your email provided during the establishment of the relationship unless you provide us with other contact details in respect of such notifications. Any such contact details should be communicated to the Data Protection Officer.

15. Data Controller and Contact Information

15.1 The Company is generally a controller for processing of the Personal Data, however, we may provide some services as processors. If you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Notice, or if you wish to complain to our Data Protection Officer, please contact us at support@engre.co