PRIVACY POLICY

Welcome to Padsystem!

Padsystem is owned and operated by Pad System International Ltd.

Padsystem values your privacy and the protection of your personal data. This privacy policy describes what information we collect from you, how we collect it, how we use it, how we obtain your consent, how long we keep it in our databases and, if necessary, with whom we share it.

By using the platform and services, you are accepting the practices described in this privacy policy. Your use of the platform is also subject to our terms and conditions. In this privacy policy, the words "platform" refers to the Padsystem website, "we", "us", "our", and "Padsystem", refers to Padsystem, and "you", and "user", refers to you, the Padsystem user.

This privacy policy may change from time to time. Your continued use of the platform and services after we make changes to this privacy policy will be deemed acceptance of those changes, so please check this policy periodically for updates. This privacy policy has been developed and is maintained in accordance with all applicable national and international privacy and data protection laws and regulations and specifically, the General Data Protection Regulation ("GDPR") and the Personal Data (Privacy) Ordinance ("PDPO").

1. GENERAL INFORMATION

The personal data of users that are collected and processed through:

https://www.padsystem.com

Will be under the responsibility and in charge of:

Pad System International Ltd.

• Phone: (852) 2239 5995

Email: sales@padsystem.com

2. HOW WE OBTAIN YOUR CONSENT

When you visit the website, register as a user, use the free trial or purchase a subscription, use the functionalities available on the platform, provide content through the platform, contact us through our chat or contact information, you consent to our collection, storage and use of your information under the terms set out in this privacy policy.

3. TYPES OF INFORMATION COLLECTED

The information we collect from our users helps us to continually improve the user experience on the platform. These are the types of information we collect:

Information you provide to us. You provide information when you visit the website, register as a user, use the free trial or purchase a subscription, use the functionalities available on the platform, provide content through the platform, contact us through our chat or contact information. As a result of those actions, you may provide us with the following information:

- Full name
- Email
- Phone number

Usage Data: As you browse our website, certain usage data is automatically collected. These include technical information such as the IP address of your device, the type and version of your browser, the specific pages you visit on our website, the date and time of your access, the amount of time you spend on those pages, and other diagnostically relevant data.

In the case of access via mobile devices, we also collect information specific to these devices. This may include, but is not limited to, the type of mobile device used, its unique identifier, the IP address of the device, the mobile operating system and the type of mobile browser, along with other identifiers and diagnostic data.

In addition, we collect information that your browser automatically provides each time you visit our website or access our website using a mobile device.

User Content: Content and files provided by the user will be stored and processed in our cloud storage services. This content will be available for as long as the subscription and license keys are valid. If the license keys or subscription are cancelled, access to the content will be disabled, and it will remain stored for 15 days. After this period, the data will be permanently and irreversibly deleted. Users are advised to make backup copies prior to cancellation.

Payment Data: Payment data refers to information related to the user's payment information such as name, phone number, email address, card number, expiration date, security code, etc., depending on the payment method selected by the user when purchasing a subscription. Your payment details will be processed by the payment processors available on this platform, which will process and store your data securely and for the sole purpose of processing subscription payments. Padsystem reserves the right to engage any payment processor available.

Social Media: Our website provides various links that allow you to interact with social media platforms. You are encouraged to use these features to share information as you see fit. However, we strongly recommend that you review the privacy and data protection policies of the social media sites you use through our website to understand how they handle your personal information:

YouTube: https://policies.google.com/privacy

• LinkedIn: https://www.linkedin.com/legal/privacy-policy

Facebook: https://www.facebook.com/privacy/explanation

Contact information: We may access some personal information about the user, such as name and email address, when the user or any third party communicates with us through our contact information. Personal information provided through our contact information is not stored on any Padsystem server and will be stored on the respective server of our email service.

4. HOW LONG WE KEEP YOUR DATA

Personal data provided by users through the platform will be retained for the time necessary to provide the functionalities available on the platform, fulfill the legitimate purposes described in section 5 of this policy or until the user closes the user account, cancels the service and subscription or requests the deletion of their data. If the user cancels the service or the service is interrupted, Padsystem will retain the files associated with the account for a period of 15 calendar days. During this period, the user will be able to retrieve or download their content. After this period has elapsed without the account or services being reactivated, Padsystem will proceed to permanently delete all files stored in the user's account. This deletion will be final and irreversible, and Padsystem will not maintain backup copies or records of the deleted content.

Padsystem may retain personal data for a longer period provided that the user has consented to such processing, as long as such consent is not withdrawn. In addition, Padsystem may be obliged to retain personal data for a longer period provided that this is required for compliance with a legal obligation or by order of an authority. Once the retention period has expired, the personal data will be deleted. Therefore, the right of access, the right of deletion, the right of rectification and the right to data portability cannot be asserted after the retention period has expired.

5. HOW WE USE YOUR INFORMATION (LEGITIMATE PURPOSES)

In general, we use the information we collect primarily to provide, maintain, protect and improve our platform and to provide the functionalities available on the platform appropriately. We use personal information collected through our platform as described below:

- Facilitate the registration of our users.
- Provide our license keys.
- Provide the functionalities available on the platform.
- Store the user's content and files in our cloud storage services.
- Provide our free trial period.
- Provide our subscription plans.
- Process subscription payments.

- Provide the functionalities available on the platform.
- Understand and improve your experience using our platform.
- Respond to your comments or questions through our support team.
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- Send you notifications and relevant information about Padsystem.
- Padsystem marketing purposes.
- Process user requests related to the exercise of their rights over their personal data.
- Link or combine your information with other data we obtain from third parties to help us understand your needs and provide you with better service.
- Protect, investigate and deter fraudulent, unauthorized or illegal activities.

6. HOW WE SHARE INFORMATION

Information about our users is an important part of our business, and we are not in the business of selling it to third parties. We share customer information only as described below.

Third-party suppliers. We use third party services to perform certain functions on our platform. Some of these functions and services include: website creation and hosting, payment processing, cloud hosting services, email delivery, and data tracking and analysis on the platform.

These third-party services and tools may have access to personal information needed to perform their functions, but may not use that information for other purposes. Information shared with these third-party services will be treated and stored in accordance with their respective privacy policies and our privacy policy.

E-mail communications. By providing us with your email address, you consent and agree that we may send relevant content, notifications and information to your email address. Therefore, your email address may be shared with third party bulk email services for the sole and exclusive purpose of sending you relevant communications. If you wish to stop receiving communications from Padsystem, you may unsubscribe at any time by using the "unsubscribe" option available in the same emails or by sending your request through our contact information.

Business Transfers. In the event Padsystem creates, merges with, or is acquired by another entity, your information will likely be transferred. Padsystem will send you an email or post a prominent notice on our platform before your information becomes subject to another privacy policy.

Protection of Padsystem and Others. We release personal information when we believe release is appropriate to comply with the law, enforce or apply our terms and conditions and other agreements, or protect the rights, property, or safety of Padsystem, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Anonymous Information. Padsystem uses anonymous browsing information collected automatically by our servers primarily to help us administer and improve the platform. We may also use aggregated anonymous information to provide information about the platform to potential business partners and other unaffiliated entities. This information is not personally identifiable.

7. DATA BREACH NOTIFICATIONS

In the event of a security breach that compromises the confidentiality of the personal data of our users, Padsystem undertakes to notify those affected in a timely manner. This notification will be made through the means of contact that have been provided by the user on our platform. We will take all reasonable measures to protect the information and remedy any situation that compromises the security of your data.

8. INTERNATIONAL DATA TRANSFER

By using our platform, you agree that your personal data may be transferred and processed outside your country of origin, where data protection laws may differ. Padsystem is committed to taking the necessary steps to ensure that your data is treated in accordance with applicable privacy standards and is adequately protected during any international transfer.

9. PROTECTION OF YOUR INFORMATION

We grant access to your personal information only to those outside persons or services that have a legitimate need to know it and in accordance with our privacy policy. We adhere to industry-recognized security standards to protect your personal information, both during transmission and in storage. However, it is important to note that no method of transmission over the Internet or electronic storage is foolproof and 100% secure. Therefore, while we at Padsystem strive to implement commercially viable data protection methods, we cannot ensure absolute security of your personal information. We undertake not to sell, distribute or transfer your personal data to unauthorized third parties, unless we have your explicit consent or are required by law to do so.

10. RIGHTS

Users who provide information through our platform, as data subjects, have the right to access, rectify, download or delete their information, as well as to restrict and oppose certain processing of their information. While some of these rights apply generally, others only apply in certain limited circumstances. These rights are described below:

- Access and portability: to access and know what information is stored on our servers, you can send us your request through our contact information.
- **Rectification, restriction, limitation and deletion:** You may also rectify, restrict, limit or delete much of your information.
- Right to be informed: Users of our platform will be informed, upon request, about what
 data we collect, how it is used, how long it is kept and whether it is shared with third
 parties.
- Object: Where we process your data based on our legitimate interests, as explained above, or in the public interest, you may object to this processing in certain circumstances. In such cases, we will stop processing your information unless we have legitimate grounds to continue processing it or where necessary for legal reasons.
- Withdraw consent: Where you have previously given your consent, for example to allow us to process and store your personal information, you have the right to withdraw your consent to the processing and storage of your information at any time. For example, you can withdraw your consent by updating your settings. In certain cases, we may continue to process your information after you have withdrawn your consent if we have a lawful basis for doing so or if your withdrawal of consent was limited to certain processing activities.
- **Complaint:** If you wish to lodge a complaint about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority. Users may exercise all of these rights by contacting us via the contact information or contact page.
- Rights related to automated decision-making, including profiling: Users may request that
 we provide them with a copy of the automated processing activities we conduct if they
 believe that data is being unlawfully processed.

Users or holders of personal data provided through the platform may exercise these rights over their personal data at any time and without limitation by sending their request through our contact information. The request to exercise their rights will be attended and answered within a maximum period of 10 working days.

11. PROTECTION OF CHILDREN'S ONLINE PRIVACY

We comply with national and international data protection regulations regarding the protection of children's personal data. We do not collect any information from children under the age of 13. If we become aware that a child under the age of 13 has provided us with personal information, we will take immediate steps to delete such information.

12. THIRD PARTIES

Except as expressly included in this privacy policy, this document addresses only the use and disclosure of information Padsystem collects from you. If you disclose your information to others,

whether other users or Padsystem vendors, different rules may apply to their use or disclosure of

the information you disclose to them. Padsystem does not control the privacy policies of third

parties, and you are subject to the privacy policies of those third parties where applicable.

Padsystem is not responsible for the privacy or security practices of another Internet platform,

including those linked to or from the Padsystem platform. Please review the privacy policies of

third-party websites or services that you access through the Padsystem platform.

13. CHANGES TO PRIVACY POLICY

We reserve the right to change our privacy policy at any time. Changes will be promptly notified to

our users and posted on the website. Your continued use of our website and services following

these changes constitutes acceptance of the changes.

14. CONTACT INFORMATION

If you have questions or concerns about this privacy policy and the treatment and security of your

data, please contact us through our contact forms or by using the following contact information:

Pad System International Ltd.

Phone: (852) 2239 5995

Email: sales@padsystem.com