

Huliot – Privacy Policy
Last modified: October 2025

Introduction

Huliot Group (the "**Company**", "**We**" or "**Us**") operates the website www.huliotgroup.com (the "**Website**"). This Policy is integrated into and forms part of our Terms of Use [link] ("**Terms**").

We are dedicated to protecting your privacy rights and making our practices regarding the processing of your personal data more transparent and fair. This Privacy Policy ("**Policy**") was designed to help you understand the information we collect, store, use and share, and it applies whenever you visit our Website. Please note that parts of this Policy may not be applicable to you, depending on the jurisdiction in which you reside and the applicable laws.

We strongly urge you to read this Policy carefully and ensure you fully understand and agree to it. If you do not agree to this Policy, please stop using our Website. You are not legally required to provide Personal Data, but without it we cannot offer you the best Website experience.

1. What types of Personal Data we collect?

We collect personal data from you, meaning any information which potentially allows your identification with reasonable means (for example, email address or name, collectively "**Personal Data**"). This section sets out how and when we collect and process Personal Data about you.

1.1. Communication information:

When you choose to reach out to us through the 'Contact Us' form on the Website, we collect your full name, email address, phone number, country of origin and any other information you choose to provide us.

1.2. Usage information:

When you visit our Website, we collect technical information about your interaction with it. This information includes geolocation data, IP address, unique identifiers (e.g., MAC address and UUID), as well as other information which relates to your activity on the Website.

2. Why do we process your Personal Data?

This section explains for what purposes we use your Personal Data and outlines the legal bases that underlie our usage:

Purpose	Legal basis
Operation of the Website; support. We use your Personal Data to operate and maintain the Website, provide the services offered through it, provide support, and resolve technical issues related to the Website and those services.	The legal bases for such processing are the performance of our contractual obligations towards you, your consent, and our legitimate interests, which are in this case the operation of the Website and supporting our end-users.
Improve our Website. We collect and analyse information about your use of the Website to enhance usability, quality, and functionality, including debugging and internal research for development.	The legal basis for processing this data is our legitimate interest. Our legitimate interests in this case are providing and improving our Website.
Marketing and Advertising. We use your Personal Data, directly or through trusted partners to provide marketing communications, personalized offers, and promotional materials relating to our services, affiliates, or business partners, subject to applicable law. You may opt out at any time by contacting us or using the unsubscribe link in the communication. Even if you unsubscribe, we may continue to send you service-related updates and notifications.	The legal bases for processing this data are your consent (when required) and our legitimate interests. Our legitimate interests in this case are providing you with tailored services, content and advertisements that better correspond with your interests.
Integrity. We process information about your use of the Website to maintain security, prevent fraud, verify identity, and enforce our policies.	The legal bases for processing this data are compliance with our legal obligations and our legitimate interests. Our legitimate interests in this case are keeping the integrity of our Website; detection of fraudulent activities; and the safety of our end-users.
Compliance with the law. We process your Personal Data to meet legal obligations and respond to lawful requests from authorities.	The legal bases for processing this data are compliance with our legal obligations and our legitimate interests. Our legitimate interests in this case are

	compliance with our legal obligations and assisting law enforcement agencies.
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3. **Tracking Technologies**

When you visit or access our Website, we use cookies, pixels, beacons, local storage and similar technologies ("**Tracking Technologies**"). These Tracking Technologies allow us to automatically collect information about you, your device, and your online behaviour, to enhance your navigation on our Website, improve performance, perform analytics, customize your experience and offer you, for example, tailored content and advertisements that better correspond with your interests.

3.1. **What types of Tracking Technologies do we use?**

When you use or access our Website, we use the following categories of Tracking Technologies:

- (a) Strictly necessary Tracking Technologies: these Tracking Technologies are automatically placed on your computer or device when you access our Website. These Tracking Technologies are essential to enable you to navigate around and use the features of our Website. We do not need to obtain your consent in order to use these Tracking Technologies.
- (b) Tracking and advertising Tracking Technologies: these Tracking Technologies collect information about your browsing to deliver interest-based ads, limit how often you see them, and measure campaign performance. They remember the sites you visit and may share that information with advertisers, publishers, and ad networks. These third parties may also use Tracking Technologies to serve and assess ads. Their collection and use are governed by their own privacy or cookie policies, which we do not control.
- (c) Functionality Tracking Technologies: these Tracking Technologies allow our Website to remember choices you make (such as your language) and provide enhanced and personalized features.

- (d) Performance Tracking Technologies: these Tracking Technologies collect information about your online activity (for example the duration of your visit on our Website), including behavioural data and content engagement metrics. These Tracking Technologies are used for analytics, research and to perform statistics (based on aggregated information).

3.2. How and by whom Tracking Technologies are stored on your device?

We store Tracking Technologies on your device when you visit or access our Website - these are called "First Party Tracking Technologies". In addition, Tracking Technologies are stored by other third parties (for example, our analytics service providers, business partners and advertisers), who run content on our Website – these are called Third party Tracking Technologies. Both types of Tracking Technologies be stored either for the duration of your visit on our Services or for repeat visits.

There are various ways in which you can manage and control your Tracking Technologies settings. You can change your preferences using our cookie settings tool (however, please note that this tool may only be available in certain jurisdictions). Other methods of managing your Tracking Technology preferences include changing your browser settings to send a “Do-Not-Track” signal. In such case, your browser will send us a special signal to stop tracking your activity. However, please note that certain features of the Services may not work properly or effectively if you delete or disable cookies.

Below is a list of useful links that can provide you with more information on how to manage your cookies:

- (a) [Google Chrome](#);
- (b) [Mozilla Firefox](#);
- (c) [Safari \(Desktop\)](#);
- (d) [Safari \(Mobile\)](#);
- (e) [Android Browser](#); and
- (f) [Microsoft Edge](#)

You can learn more and turn off certain third party targeting and advertising cookies by visiting the following third party webpages:

- (a) [The Interactive Advertising Bureau \(EU\)](#); and
- (b) [European Interactive Digital Advertising Alliance \(EU\)](#)

4. With whom do we share your Personal Data?

4.1. We share your Personal Data as described below:

(a) Service providers:

Our service providers work on our behalf and need access to certain Personal Data in order to provide their services to us. These companies include, but are not limited to, cloud storage providers, analytics services, fraud prevention, identity verification providers, etc.;

(b) Third party advertisers:

We partner with third parties to either display advertising on our Website or to manage our advertising on other websites or apps. Our third party advertisers use Tracking Technologies to gather information about your activities on our Services and other websites and apps in order to provide you advertising based upon your browsing activities and interest.

(c) Compliance with laws and assistance to law enforcement agencies:

We may disclose Personal Data when required by law, legal process, or lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose such data where we believe it is necessary to protect rights, property, or safety, or to prevent or stop unlawful or unethical activity;

(d) Auditors and advisers:

We share Personal Data with our auditors, advisors, and professional service providers (such as lawyers, accountants, and insurers) to ensure regulatory compliance, support auditing, and manage disputes; and

(e) Mergers and acquisitions:

We may transfer, sell, or otherwise share Personal Data in connection with business transactions such as mergers, acquisitions, reorganizations, bankruptcy, or sales of assets.

5. Your rights

Depending on the jurisdiction in which you reside, you may have certain rights under relevant applicable laws regarding the collection and processing of your Personal Data. To the extent these rights apply and concern you, you can contact us via the contact details available below and ask to exercise the following rights:

- Rights of access to your Personal Data;
- Right of data portability;
- Right of rectification;
- Right of deletion/erasure;
- Right to restriction or objection to processing;
- Right to withdraw your consent;
- Right to limit use and disclosure of your sensitive Personal Data;
- Right not to be subject to automated decision making;
- Right to non-discrimination;
- Right to lodge a complaint and appeal our decisions.

all requests, complaints or queries may be addressed to the Company to the following email address: [info@huliot.com]. We will consider any requests, complaints or queries and provide you with a reply in a timely manner. To the extent you feel unsatisfied with our response to your request to exercise your rights, you also have a right to address the applicable regulator in your jurisdiction, based on the laws in your jurisdiction.

Please note that these rights are not absolute, and may be subject to the relevant applicable laws, our own legitimate interests and regulatory requirements.

6. International data transfers

Please note that our businesses, as well as our trusted partners and service providers, are located around the world. Any information that we collect (including your Personal Data) may be stored and processed in various jurisdictions around the world, for the purposes detailed in this Policy, including in countries that may not provide the same level of data protection as the country where you reside. In such cases we will ensure that applicable safeguards and legal mechanisms are used to ensure that the transfer is aligned with the applicable data protection laws.

7. Minors

We do not knowingly collect Personal Data from Minors (as determined under the applicable laws where the individual resides; “**Minors**”). By accessing or using our Website, you certify to us that you are not a Minor. In the event that we have collected Personal Data from a Minor without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about a Minor, then please contact us through the contact details available below.

8. Retention

We will retain your Personal Data only as long as necessary to provide access to our Website, comply with legal obligations, resolve disputes, and enforce our policies. Retention periods depend on the type and purpose of the data, with outdated or unused information deleted at the earliest reasonable time.

9. Updates to this Policy

We reserve the right to change this Policy at any time. The most current version will always be posted through our Website (as reflected in the “Last Modified” heading). You are advised to check for updates regularly. By continuing to access the Website after any revisions become effective, you agree to be bound by the updated Policy.

10. Controlling version

This Policy has been drafted in the English language, which is the original and controlling version of this Policy. All translations of this Policy into other languages shall be solely for convenience and shall not control the meaning or application of this Policy. In the event of any discrepancy between the meanings of any translated versions of the Policy and the English language version, the meaning of the English language version shall prevail.

11. Contact us

If you have any further questions, please contact us by email at: info@huliot.com