

Data Privacy Policy

Introduction

Your privacy is important to GPU-Prime.Ltd and its partners, each acting as a data controller (or equivalent) (collectively, “GPUP,” “we,” “our,” and “us”). This Privacy Policy describes GPUP’s personal information practices and applies to all GPUP websites, products, processes, events, and applications referencing and/or linking to this Privacy Policy (collectively, the “Sites”). A summary of the types of information that GPUP gathers and how such information is used, shared, and/or sold is outlined below.

Types of Information We Collect

For the purposes of this Privacy Policy, we use the terms “personal data” and “personal information” interchangeably to refer to any information that directly or indirectly relates to or could reasonably be linked to an identified or identifiable individual, consumer, or household. Below, we describe the types of information we may collect about you, and how that information is processed. Such information may be personal information.

- Your name;
- Your place of employment, company size, and job title;
- Your contact information such as physical address, email address, and phone number;
- Your username, password, and other registration information;
- Your demographic information, such as age and gender;
- Information about your preferences, and interests;
- Information you provide when submitting an employment application;
- Transaction-related information (including payment details);
- Online identifiers, such as your internet protocol address and mobile phone identifiers;
- Usage and location data;
- Browser type and operating system;
- Webpages you view on the Sites;
- Clickstream data;
- Time and length of your visit to the Sites;
- Search terms you enter on the Sites;
- Domain name;
- Information you provide when you make a request or otherwise contact us; and

- Any other information you choose to make public on the Sites (e.g., information shared with other members of our user community).

Sources of Information

We may collect personal information from you directly, including, but not limited to, when you:

- Register for and/or attend a seminar, webinar, training course, or other event;
- Create an account or a profile;
- Participate in our user community or otherwise contribute content to the Sites, such as by authoring a post on our forums or commenting on a blog post;
- Submit an employment application and/or resume, or fill out other employment documentation;
- Make a purchase;
- Provide feedback or complete a survey;
- Request information from us, or otherwise communicate with us;
- Download software, upload a project, or use one of our tools;
- Enter into a contract with us personally, or on behalf of a company that you represent;
- Sign up to receive electronic newsletters, blog posts, and/or other materials; or
- Otherwise contact us with a question, comment, feedback, or request, including service requests.

We may also collect information about you indirectly, including, but not limited to:

- When a partner, acquired affiliate, or other third party (e.g., a service provider) provides us information about you (but note that when you provide personal information directly to a third party, that party's privacy policy will govern their collection and use);
- When your devices, such as smartphones, tablets, or computers, automatically submit information (e.g., see the Cookies and Analytics Information section below); and
- When such information is available from public sources.

Use of Information

We process personal data where the processing is necessary to perform a contract between you and GPUP, to take steps at your request prior to entering into such contract, to comply with our legal obligations, or to exercise our legal rights. We may also process your information when the processing is otherwise in GPUP's or a third party's legitimate interests and in accordance with applicable law. In

particular, we and service providers working on our behalf, may use the information for a number of purposes, including, but not limited to:

- Providing you with the information that you request, or otherwise communicating with you;
- Managing your account and providing you with information about the Sites, such as changing your user profile, notifying you of recent updates to the Sites, and providing you with patch releases or warranty information;
- Processing any transactions or providing any services you authorize, such as a purchase or service request, and maintaining and supporting our products to the extent necessary for the provision of the services;
- Processing and managing your employment application (which may include, for example, a background check and/or the provision of immigration support);
- Delivering marketing communications, promotional materials, or advertisements as well as product news or notifications;
- Allowing us to improve the Sites and the products and services we provide, including by means of artificial intelligence technologies such as large language models and generative AI;
- Providing personalized, targeted, or location-based content;
- Comparing your information to confirm accuracy and to verify it with partners, suppliers and third parties as needed (such as for export compliance purposes);
- Enforcing our Privacy Policy, other policies, terms of use, and license agreements;
- Generating and analyzing statistics about your use of the Sites; and,
- Detecting, preventing, and responding to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the Sites, GPUP systems or assets.

We and service providers working on our behalf also may combine or aggregate any of the information we collect through the Sites or elsewhere for any of these purposes.

You are not obligated to provide us any personal information. However, if you do not, you may not be able to access certain product or service offerings. For example, certain areas of the Sites require user registration, which requires that you provide us with certain personal information.

Disclosure of Information

We may disclose each of the types of information described in the “Types of Information We Collect” to third parties, as described in this Privacy Policy, with other individuals or entities in situations such as the following:

- When we have your permission;
- When you choose to make information public on the Sites, such as when you contribute a post to our GPUP Technology Forums;
- To service providers who work on our behalf and have agreed to use the information solely to provide the services requested by GPUP, including, but not limited to, service providers that process payments, provide support services, or provide shipping services;
- To service providers, advisors, and other third parties to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, or sale of all or a portion of our assets, provided that any third party that acquires our company will assume the rights and obligations regarding your information as described in this Privacy Policy; or
- When we believe in good faith that such disclosure is to (a) comply with relevant laws or to respond to court orders or other legal process served on GPUP, including to meet national security or law enforcement requirements; (b) protect and defend the rights or property of GPUP or users of the Sites; or (c) detect, prevent, or respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the Sites.

In particular, depending on the products and/or services you use, the following are categories of information that are disclosed, and the steps we take to limit the manner in which your personal information is used:

- We may provide contact information, to direct mail and other similar organizations, for the purposes of sending you information that you have agreed to receive. These companies may only use your information to perform functions on behalf of GPUP, as defined by the relevant service agreements.
- We may provide contact information, software usage, employment information, browsing history, and referral information, to business partners, so they may fulfil customer requests. In certain cases, we may contact users annually to confirm your desire to continue receiving information, and you may otherwise opt out as described further below.
- We may provide contact information, employment information, and license privileges of users of certain tools, to business customers, for purposes of identifying to whom software products should be distributed. Information is only shared with those customers to whom you have licensed their software product, and GPUP is under a contractual obligation to provide the list of users to those business partners, for use of the software.

Sale of Information

In limited circumstances, we may disclose your information—with your consent—in ways that may be considered a sale in certain jurisdictions, including as follows:

- GPUP may receive payment from business partners that are authorized to sell GPUP products; should a sale result from our disclosure of your contact information to that partner, pursuant to the section above regarding “Disclosure of Information.”
- Under certain circumstances, our partners may also offer payment for provision of your contact information and interests (based on your browsing history), also pursuant to the section above regarding “Disclosure of Information.”
- We may receive in-kind compensation from partners in exchange for providing them with your personal information (e.g., event sponsorship).

Other than the limited instances identified above, GPUP does not sell your personal information to third parties.

Security of Your Information

We maintain reasonable physical, technical, and administrative procedures and practices to safeguard the information that we collect, and as is appropriate for the nature of the information. However, we cannot ensure the absolute security of your information, particularly of information you transmit to the Sites over networks that we do not control, including the Internet and wireless networks. As a result, we suggest that you help us by protecting your passwords, not using the same password for different applications or sites on the Internet, and notifying us if you suspect that your credit card, user name, or password is lost, stolen, or used without permission.

Children’s Privacy

The Sites are not directed to, nor do we knowingly collect information from, anyone under 13 years of age. If you learn that your child provided us with information without your consent, please contact us at the contact information listed below.

Location of Your Information

Information covered by this Privacy Policy will be transferred to, stored at, and processed in the United Kingdom and other countries in which GPUP offices are located or where GPUP does business, which may not provide the same level of protection for your personal information as your home country. Before transferring your personal information, we will take steps to ensure that such data will be afforded the level of protection required under applicable data protection laws. For such data transfers, we may use the standard contractual clauses adopted by the European Commission and will make available a copy to you upon request. In addition, we may further transfer your information to our affiliates, partners, and service providers located in other countries, or as otherwise permitted or required by applicable law.

Retention Period

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy. The criteria used to determine such retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal or business obligation to which we are subject; or (iii) whether a longer retention period is required or permitted by law, for example to maintain certain contractual or tax records.

Your Choices and Rights

Your Rights

Every visitor to our Sites has the following rights:

Access. You have the right to request that GPUP provide you with copies of your personal information.

Rectification. You have the right to request that GPUP correct any information that you believe is inaccurate. You also have the right to request that GPUP complete information about you that you believe is incomplete.

Erasure. You have the right to request that GPUP erase your personal data, under certain conditions.

Restrict processing. You have the right to request that GPUP restrict the processing of your personal information, under certain conditions.

Object to processing. You have the right to object to GPUP's processing of your personal data, under certain conditions.

Data portability. You have the right to request that GPUP transfer the data that we collected to another organization, or directly to you, under certain conditions.

You also have the right to file a complaint with a competent supervisory authority.

Making a Request

You may exercise any of the above rights by contacting us at s.karabasov@gpuprime.co.uk. We will respond to your request as soon as reasonably practicable and in accordance with applicable law. To the extent required under legal obligations or local laws, or if it is subject to certain defined exceptions, some of your information may remain within our systems and other records.

Additional User Choices

If we have obtained your e-mail address in connection with your purchase of or access to our goods or services, or attendance at a virtual event, we may send you related promotional or marketing e-mails. You may opt-out from receiving these e-mails by notifying us at the address specified at the bottom of any unwanted e-mail. These opt-out procedures may not be available for transactional or relationship messages, such as e-mails that are necessary to provide you with confirmation of a completed transaction (such as a purchase, service request, or change in your user profile), to provide you with warranty information regarding a

particular product you purchased, to provide notification of changes of terms of service, or to provide you with important information about the use of a product that you have purchased or software that you have downloaded.

Non-Discrimination.

We will not discriminate or retaliate against you for exercising any of the rights described in this Privacy Policy. Unless otherwise permitted by law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Nonetheless, as described above, use or purchase of certain products or services may require the collection and/or maintenance of personal information.

Links to Other Sites

The Sites may contain links to third-party websites and applications. Our provision of a link to any other website or application is for your convenience and does not signify our endorsement of such other website or application or its contents. We have no control over, do not review, and cannot be responsible for these third-party websites and applications or their content. Please be aware that the terms of our Privacy Policy do not apply to these third-party websites and applications.

Contact Information

GPUP welcomes your comments or questions regarding this Privacy Policy. Please contact GPUP at s.karabasov@gpuprime.co.uk.

Further information about GPUP's offices and contacts is available at <https://www.gpuprime.co.uk/>

Privacy Policy Updates

GPUP may supplement or amend this policy from time to time, and will post a revised Policy on our Sites, and update the "Revised" date below. If we make material changes to the way we collect, use, or disclose your personal information, we will notify you by any additional means that are appropriate.

Last Revised: 1 July 2024