

# Privacy Policy

*(effective as of 01/08/2025)*

## 1. About this Policy

This Privacy Policy explains how Infinity Victory FZCO (“Data Controller”, “we”, “us”), a company incorporated under the laws of the United Arab Emirates (registered at IFZA Business Park, Dubai Digital Park, Dubai, license no. 34852), collects, uses, stores, and protects your personal data when you visit and use our website [www.poolse.com] (the “Website”) and related services.

As our services are accessible to individuals within the European Union and the European Economic Area (EEA), we process personal data in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

If you have any questions about this Policy or your rights, you may contact us at:

Email: [privacy@poolse.com](mailto:privacy@poolse.com)

Address: IFZA Business Park, Dubai Digital Park, Dubai, UAE

## 2. Categories of Data We Collect

We may collect and process the following categories of personal data:

- Identification & contact data: name, email address, phone number, username.
- Account data: login credentials, subscription details, preferences.
- Payment & billing data: name, billing address, tax ID (handled via third-party payment processors; we do not store card details).
- Technical data: IP address, browser type, device identifiers, cookies.
- Usage data: interactions with our Website and services.

### 3. Purposes and Legal Basis of Processing

We process your personal data only where a lawful basis under Article 6 GDPR applies:

Purpose	Data Processed	Legal Basis
User registration & account management	Identification & account data	Contract performance (Art. 6(1)(b))
Subscription and service delivery	Account & usage data	Contract performance (Art. 6(1)(b))
Payment and invoicing	Billing & payment data	Legal obligation (Art. 6(1)(c))
Customer support & communication	Contact & account data	Legitimate interest (Art. 6(1)(f))
Marketing & newsletters (optional)	Contact data	Consent (Art. 6(1)(a))
Website functionality (cookies)	Technical & usage data	Consent (Art. 6(1)(a)) or legitimate interest (Art. 6(1)(f))

### 4. Data Sharing and International Transfers

Personal data is primarily processed by Infinity Victory FZCO in Dubai (UAE).

As the UAE is considered a third country under GDPR, transfers are safeguarded using Standard Contractual Clauses (SCCs) approved by the European Commission.

Data may also be shared with:

- Payment processors (e.g., Stripe, PayPal)
- Accounting/tax authorities (where legally required)
- IT and hosting service providers under strict confidentiality agreements

We do not sell personal data to third parties.

## **5. Data Retention**

We keep personal data only for as long as necessary:

- Account data: during the contractual relationship and 30 days after termination.
- Billing/invoicing data: 5 years (or longer if required by law).
- Cookies: session-based or up to 12 months (depending on settings).
- Marketing data: until you withdraw consent.

## **6. Your Rights under GDPR**

As a data subject in the EU/EEA, you have the following rights:

- Access to your data (Art. 15 GDPR)
- Rectification of inaccurate data (Art. 16 GDPR)
- Erasure ("right to be forgotten", Art. 17 GDPR)
- Restriction of processing (Art. 18 GDPR)
- Data portability (Art. 20 GDPR)

- Objection to processing (Art. 21 GDPR)
- Withdrawal of consent at any time (Art. 7 GDPR)

To exercise these rights, please contact us at [[privacy@poolse.com](mailto:privacy@poolse.com)].

## **7. Cookies and Tracking Technologies**

Our Website uses cookies and similar technologies to ensure proper functionality, analyse traffic, and personalise content.

- Strictly necessary cookies – required for site operation
- Analytics cookies – improve performance and user experience.
- Marketing cookies – personalise ads and measure effectiveness.

You may manage your cookie preferences in your browser settings.

## **8. Security of Data**

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks, including encryption, access controls, and secure hosting.

## **9. Complaints and Supervisory Authority**

If you believe that we have violated your data protection rights, you may contact us directly at [privacy@poolse.com](mailto:privacy@poolse.com) or Lodge a complaint with your local EU supervisory authority (list available at: [<https://edpb.europa.eu>])

## **10. Changes to this Privacy Policy**

We may update this Policy from time to time. Updates will be posted on this page with a revised "effective date."