

# PRIVACY POLICY AND DATA PROTECTION NOTICE

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## 1. COMMITMENT TO PRIVACY

Procubility Limited ("Procubility," "we," "us," or "our") is committed to protecting the privacy and security of our clients, suppliers, and website visitors. As a B2B supply chain orchestrator, we handle sensitive intellectual property and proprietary business data. This Policy outlines our practices regarding the collection, processing, and protection of information in compliance with the EU General Data Protection Regulation (GDPR), the Hong Kong Personal Data (Privacy) Ordinance (PDPO), and China's Personal Information Protection Law (PIPL).

## 2. INFORMATION COLLECTION SCOPE

We collect information only where necessary to provide our supply chain orchestration services. This data falls into three categories:

- **Corporate Identity Data:** Information provided during business registration or contract execution, including business name, corporate address, industry category, and registration numbers.
- **Professional Contact Data:** Details of procurement officers and key account managers, including names, official email addresses, business telephone numbers, and professional roles.
- **Technical and Operational Data:** Proprietary documentation necessary for manufacturing, including Tech Packs, CAD files, blueprints, BOM (Bill of Materials), and quality specifications. We consider this the most sensitive tier of data.

## 3. PURPOSE OF PROCESSING

We process data solely for the following business objectives:

- **Service Fulfillment:** To facilitate sourcing, factory vetting, production monitoring, and quality assurance.
- **Logistics and Compliance:** To coordinate international shipping, customs declarations, and ESG/CBAM reporting.
- **Communication:** To provide project updates, industry insights, and critical supply chain notifications.
- **Legal Compliance:** To fulfill our obligations under international trade laws and corporate governance mandates.

#### 4. DATA SECURITY AND PROTECTION STANDARDS

Procubility employs technical and organizational measures to safeguard data:

- **Encryption:** All data stored on our servers is encrypted at rest using AES-256 standards.
- **Access Control:** We operate under a strict "Need-to-Know" protocol. Only authorized personnel directly involved in a specific project have access to client-specific blueprints and technical data.
- **Secure Data Transfers:** We utilize secure, encrypted tunnels for all file sharing with manufacturing partners.
- **Anonymization:** Whenever possible, we provide manufacturers with only the technical specifications required for production, shielding the client's identity until such time as it is commercially necessary.

#### 5. THIRD-PARTY DATA HANDLING

Procubility does not sell, rent, or lease business information to third parties. Data is shared with sub-contractors (such as logistics providers or testing labs) only to the extent necessary to fulfill our service obligations. These partners are contractually bound by confidentiality agreements that meet or exceed the standards of this Privacy Policy.

#### 6. DATA RETENTION AND DISPOSAL

We retain professional data only for as long as is necessary to maintain our commercial relationship or to satisfy legal and financial record-keeping requirements. Upon the termination of a contract, clients may request the secure deletion of their proprietary technical data, subject to our obligations to maintain records for tax and legal compliance.

#### 7. DATA SUBJECT RIGHTS

Procubility recognizes the rights of our clients as data subjects, including:

- **Right of Access:** The right to request a copy of the personal or business data we hold.
- **Right of Rectification:** The right to request the correction of inaccurate or incomplete data.
- **Right to Erasure:** The right to request the deletion of data when it is no longer necessary for the purpose of the engagement.
- **Right to Object:** The right to object to the processing of data for direct marketing or other non-essential activities.