

GCD Investment Group

Privacy Policy

Effective Date: June 6, 2026 | Last Updated: June 6, 2026

GCD Investment Group ("GCD," "we," "us," or "our") is committed to protecting the privacy of individuals who visit our website at globalclouddata.org, submit investment enquiries, engage with our investor relations programme, or otherwise interact with us. This Privacy Policy explains what personal data we collect, why we collect it, how we use and safeguard it, and what rights you hold.

GCD Investment Group operates from its principal place of business at:

GCD Investment Group

Al Rayfah St, Al Reem Island, RT3
Abu Dhabi, United Arab Emirates

GCD Investment Group is the parent organisation of LSE Group Corporation, a Wyoming-incorporated enterprise, and operates across investment, data-centre infrastructure, and technology services divisions. LSE Group's own products and services (including Lumanet) are governed by separate terms and privacy policies available at lumanet.info.

1. Scope of this Policy

This Policy applies to:

- Visitors to globalclouddata.org and any subdomains
- Individuals and entities submitting investment or business enquiries
- Prospective investors and counterparties in investor relations communications
- Recipients of email communications originating from GCD infrastructure
- Parties engaging with GCD's datacenter and infrastructure services

This Policy does not apply to third-party websites linked from our site, nor to LSE Group's SaaS products, which maintain their own privacy policies.

2. Information We Collect

A. Information You Provide Directly

- Name, title, and organisation
- Email address and telephone number

- Correspondence content — enquiry messages, meeting requests, due-diligence communications
- Investment-related documentation submitted at your discretion

B. Information Collected Automatically

- IP address, browser type, operating system, and referring URL
- Pages visited, time on site, and navigation path
- Server-side access logs retained on GCD's self-hosted infrastructure

GCD operates exclusively first-party, self-hosted analytics. We do not use Google Analytics, Meta Pixel, or any third-party tracking or advertising technology on our website.

C. Email Infrastructure Data

GCD operates an in-house email infrastructure (Postfix/Modoboa) hosted within Equinix datacenters. Standard SMTP metadata — including sender and recipient addresses, timestamps, and message headers — is logged for operational and security purposes. Email content is not retained beyond delivery unless you are an active correspondent with GCD.

3. How We Use Your Information

- To respond to investment enquiries and conduct investor relations activities
- To operate and maintain secure email communications
- To monitor and protect the integrity of our IT infrastructure
- To comply with applicable legal and regulatory obligations
- To detect and prevent fraud, abuse, and security threats
- For internal record-keeping and audit purposes

We do not use your information for advertising, behavioural profiling, or automated decision-making. We do not sell, rent, or share your personal data with third parties for commercial purposes — period.

4. Legal Bases for Processing

GCD processes personal data under the following legal bases, applied across all jurisdictions in which we operate:

UAE Personal Data Protection Law (PDPL — Federal Decree-Law No. 45 of 2021)

- **Consent** — where you have freely given, informed, and specific consent
- **Contractual necessity** — processing necessary to take pre-contractual steps at your request or to perform a contract
- **Legal obligation** — compliance with UAE federal law or regulatory requirements

- **Legitimate interests** — IT security, fraud prevention, and infrastructure integrity, where not overridden by your rights

EU General Data Protection Regulation (GDPR) — EEA Visitors

- **Art. 6(1)(a)** — Consent, where explicitly given
- **Art. 6(1)(b)** — Performance of contract or pre-contractual steps
- **Art. 6(1)(c)** — Legal obligation
- **Art. 6(1)(f)** — Legitimate interests (IT security, fraud prevention, infrastructure integrity)

United States

For US persons, processing is conducted in accordance with applicable federal and Wyoming state law, including the CAN-SPAM Act for email communications.

Singapore (PDPA)

For Singapore-resident individuals, processing is conducted in accordance with the Personal Data Protection Act 2012 (PDPA). GCD's Singapore datacenter infrastructure processes operational log data only.

5. Sharing and Disclosure

GCD does not sell or share personal data with third parties for commercial or advertising purposes. Disclosure occurs only in the following limited circumstances:

- **Infrastructure providers** — Equinix Inc., as datacenter colocation provider, under strict data processing agreements. Equinix does not process personal data beyond physical infrastructure access controls.
- **Legal authorities** — where required by applicable UAE, US, EU, or Singaporean law, valid court order, or regulatory demand. GCD will, where legally permitted, notify affected parties before disclosure.
- **Professional advisors** — legal counsel, auditors, and financial advisors bound by professional confidentiality obligations.
- **Business transfers** — in the event of a merger, acquisition, or sale of substantially all assets, affected parties will be notified in advance.

6. International Data Transfers

GCD operates infrastructure across Atlanta (USA), Singapore, Milan (EU), and Abu Dhabi (UAE). Personal data may be processed across these locations as part of normal infrastructure operations.

For transfers of EEA personal data to non-EEA infrastructure, GCD applies Standard Contractual Clauses (SCCs) approved by the European Commission and/or other lawful transfer mechanisms

under GDPR Chapter V. EU/EEA customer data is preferentially processed on Milan, Italy infrastructure.

For transfers subject to the UAE PDPL, GCD applies appropriate safeguards as required by the UAE Data Office.

7. Data Retention

- **Website enquiry data** — retained for 3 years from last contact, or as required for ongoing investor relations.
- **Email server logs** — retained for 90 days for operational and security purposes, then purged from production systems. Extended retention in backup systems up to 180 days.
- **Active correspondence** — retained for the duration of the business relationship plus 7 years as required by applicable financial and corporate record-keeping law.
- **Financial and transaction records** — 7 years minimum as required by UAE Commercial Transactions Law and applicable US federal law.

You may request deletion of your personal data at any time. See Section 8 for how to exercise this right.

8. Your Rights

Depending on your jurisdiction, you hold the following rights regarding your personal data:

- **Access** — obtain a copy of personal data we hold about you
- **Rectification** — request correction of inaccurate or incomplete data
- **Erasure** — request permanent deletion of your personal data
- **Restriction** — ask us to pause processing while a dispute is resolved
- **Objection** — object to processing based on legitimate interests
- **Data portability** — receive your data in a structured, machine-readable format
- **Withdrawal of consent** — withdraw any previously given consent at any time, without affecting the lawfulness of prior processing
- **Non-discrimination** — exercising any right will not result in any penalty or adverse treatment

To exercise any of these rights, contact us at: privacy@globalclouddata.org

We will respond within **30 days** of receipt (extendable by a further 30 days for complex requests, with written notice). We will not charge a fee for reasonable, non-repetitive requests.

9. Security

GCD implements administrative, technical, and physical safeguards to protect personal data, including:

- TLS encryption enforced for all inbound and outbound email transport
- WolfSSL-based TLS implementation across all infrastructure endpoints
- Secrets management via isolated, audited vault infrastructure (OpenBao)
- Network segmentation and access controls enforced across all Equinix datacenter facilities
- Role-based access control (RBAC) with principle of least privilege
- Self-hosted identity management — no third-party identity providers
- Postscreen pre-filtering and DNSBL scoring on all inbound SMTP connections
- SPF, DKIM, and DMARC fully configured and enforced on all sending domains

No method of transmission over the internet is 100% secure. In the event of a confirmed security incident affecting your personal data, GCD will notify affected parties without undue delay and within 72 hours of becoming aware of the incident, in accordance with applicable law.

10. Children's Privacy

Our website and services are not directed to individuals under the age of 18. We do not knowingly collect personal data from minors. If we learn that we have inadvertently collected such data, we will delete it without delay.

11. Cookies and Tracking Technologies

GCD's website uses only technically necessary first-party session cookies required for basic website functionality. We do not deploy advertising cookies, third-party analytics cookies, or any cross-site tracking technologies. No cookie consent banner is required because we do not use non-essential cookies.

12. Changes to this Policy

We may update this Policy from time to time. The revised version will be posted at globalclouddata.org/privacy-policy with an updated "Last Updated" date. Material changes will be communicated by email where we hold your contact information, with a minimum of 14 days' notice before taking effect.

13. Contact and Supervisory Authorities

[GCD Data Privacy Contact](#)

Email: privacy@globalclouddata.org
Postal: GCD Investment Group, Attn: Data Privacy
Al Rayfah St, Al Reem Island, RT3, Abu Dhabi, UAE

UAE — Data Office

UAE residents may file a complaint with the UAE Data Office:
dataoffice.ae

EU/EEA — Supervisory Authority

EU/EEA residents whose data is processed on Milan, Italy infrastructure may contact:

Garante per la protezione dei dati personali

Piazza Venezia 11 — 00187 Roma, Italy
www.garanteprivacy.it | garante@gpdp.it

EU Representative (GDPR Art. 27)

Pursuant to Article 27 of the GDPR, GCD Investment Group has designated the following EU Representative:

Olaf Becker

EU Representative for GCD Investment Group
Am Ostfeld 18, 38533 Eickhorst, Federal Republic of Germany
Email: privacy@globalclouddata.org — Subject: EU Representative / GDPR

UK — Information Commissioner's Office

UK residents may contact:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
www.ico.org.uk

Singapore — Personal Data Protection Commission

Singapore residents may contact:

Personal Data Protection Commission (PDPC)

www.pdpc.gov.sg

14. Governing Law

This Privacy Policy is governed by the laws of the United Arab Emirates and, where applicable, the regulations of the Abu Dhabi Global Market (ADGM) and the Dubai International Financial Centre (DIFC). For EU/EEA residents, rights are additionally governed by the GDPR. For UK residents, by the UK GDPR and Data Protection Act 2018. For US residents, by applicable federal and state law.

Nothing in this section limits your right to bring a complaint before your applicable national or regional data protection supervisory authority.