

PRIVACY POLICY

Welcome to myoffice.dubadu.com!

We value your privacy and are committed to protecting your personal data. This privacy policy outlines how we collect, use, and protect your information when you use our platform.

DEFINITIONS

For the purposes of this Privacy Policy, we use the following terms as defined by the General Data Protection Regulation (GDPR):

1) *Personal data* - any information relating to an identified or identifiable natural person (“data subject”), such as name, email, identification number, location data, or online identifier.

2) *Processing* – any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, restriction, erasure, or destruction.

3) *Data controller* - the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data. In this case, the controller is DUBADU PORTAL LLC.

COLLECTION OF INFORMATION

1) *Contact information:*

If you fill out a contact form, we collect the information you provide, including your name, email address, phone number and any additional comments. This data is used to respond to your inquiries or provide requested information.

2) *Cookies:*

We use some or all of the following types of cookie:

Session Cookies: These are temporary cookies that are deleted when you close your browser. They help with navigation and enhance the functionality of the website during your visit.

Persistent Cookies: These cookies remain on your device for a longer period or until you manually delete them. They enable us to remember your preferences, making your future visits more convenient and personalized.

Analytical Cookies: We use these cookies to gather data on how visitors interact with our website. This helps us understand traffic patterns and user behavior, which in turn allows us to improve our services and enhance your browsing experience.

Non-essential cookies (such as analytical cookies) are only used after obtaining your explicit consent via our cookie banner or preference center. You can manage your cookie preferences at any time.

For full details, please refer to our Cookie Policy.

3) *Payment Information:*

We collect payment information to securely process transactions, adhering to PCI DSS standards for data protection.

4) *Partner Dashboard Activity:*

We collect information about your interactions within the partner dashboard, such as the number of referred agencies, associated transactions, and program metrics. This data helps us provide you with relevant insights and manage your participation in the partner program.

LEGAL BASIS AND PURPOSES OF PROCESSING

We process your personal data only where a valid legal basis under the General Data Protection Regulation (GDPR) applies. Specifically:

1) *Account Registration Data* (name, email, phone number): processed to create and manage your user account, provide access to the platform, and deliver contracted services. This is necessary for the performance of a contract (Art. 6(1)(b) GDPR).

2) *Payment Data* (payment card details, billing info, transaction records): processed to securely handle payments, manage subscriptions, and comply with accounting and tax regulations. This is necessary both for the performance of a contract (Art. 6(1)(b) GDPR) and to comply with legal obligations such as financial reporting (Art. 6(1)(c) GDPR).

3) *Customer Support Data* (emails, chat logs, inquiries): processed to respond to inquiries, resolve issues, and provide assistance. This is based on our legitimate interest in ensuring high-quality customer service (Art. 6(1)(f) GDPR).

4) *Marketing Communications* (email, SMS, push notifications): processed to send newsletters, promotional offers, and updates about our services. This is based on your explicit consent (Art. 6(1)(a) GDPR). You may withdraw consent at any time without affecting the lawfulness of prior processing.

5) *Analytics and Cookies* (device information, usage data, browsing behavior): processed to analyze platform performance, understand user interactions, and improve our services. This is done only with your explicit consent (Art. 6(1)(a) GDPR).

6) *Security and Fraud Prevention Data* (IP addresses, system logs, login attempts): processed to ensure platform security, prevent misuse or abuse, and detect fraudulent activities. This is based on our legitimate interests in maintaining a secure and reliable service (Art. 6(1)(f) GDPR).

7) *Partner Program Data* (e.g., referral performance, associated agency transactions, partner-linked activity): processed to provide access to partner dashboards, display relevant performance metrics, and administer the partner program. This is necessary for the performance of a contract (Art. 6(1)(b) GDPR) and for our legitimate interest in managing partner relationships (Art. 6(1)(f) GDPR).

8) *Training Content Access* (e.g., course progress, viewed materials, test completion): processed to deliver educational services as part of the partner program. This is necessary for the performance of a contract (Art. 6(1)(b) GDPR).

SHARING OF DATA

We do not share your personal data with third parties except when necessary and always in accordance with GDPR principles. The recipients of your personal data fall into the following categories:

1) **Internal Recipients:**

Customer Support Team. To respond to user inquiries and service requests.

Legal and Compliance Teams. For fulfilling legal obligations, handling complaints or enforcing user rights.

Marketing and Product Development Teams. Where applicable, based on your consent or our legitimate interests (e.g., improving user experience or informing users about platform features).

All internal access is restricted to personnel with proper authorization and confidentiality obligations.

2) **External Processors** (acting on our behalf under Data Processing Agreements):

Web hosting and infrastructure providers. For platform availability and performance.

Content Delivery Networks. For secure and fast delivery of website content.

E-mail communication services. To send transactional and consent-based emails.

Payment processors. To handle financial transactions securely in accordance with PCI DSS.

Analytics providers. For the purpose of understanding user interactions, platform performance, and improving user experience. We only use analytics tools that comply with

applicable data protection laws. Where required, we implement measures such as IP address truncation, data minimization, pseudonymization, and limited retention periods. Analytics tools are activated only after obtaining valid user consent (where legally required), and we ensure that such services operate under appropriate contractual safeguards, including Data Processing Agreements and, where applicable, cross-border transfer mechanisms.

Anti-spam and security tools. To protect our users and infrastructure from abuse.

These processors act strictly under our instructions and are contractually bound to comply with GDPR, including security, confidentiality, and data protection standards.

3) **External Controllers** (independent legal entities responsible for their own processing):

Government agencies, regulators, or law enforcement. Where required by applicable law or in response to lawful requests.

Auditors, legal consultants, and tax advisers. Where disclosure is necessary to fulfill our legal obligations or defend legal claims.

We ensure that any cross-border transfer of personal data is carried out in accordance with applicable data protection laws, using mechanisms such as Standard Contractual Clauses (SCCs), adequacy decisions, or explicit user consent.

In the context of the partner program, anonymized or aggregated performance metrics related to referred agencies may be visible to the referring partner. No personally identifiable information about third parties is disclosed without valid legal basis or consent.

HOW LONG WE KEEP YOUR DATA

We retain personal data only for as long as it is necessary for the purposes stated in this Privacy Policy, and in compliance with applicable legal and regulatory obligations, including but not limited to:

1) UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (Articles 10, 11 - Principles of data minimization and storage limitation);

2) UAE Commercial Companies Law (Federal Law No. 32 of 2021) - obligations to retain contractual records;

3) UAE Federal Decree-Law No. 8 of 2017 on Value Added Tax - retention of tax and financial data for at least 7 years;

4) GDPR - personal data shall not be kept for longer than necessary for the purposes for which it is processed, unless required by law.

Retention periods depend on the nature of the data and the user relationship:

1) Accounts with ongoing contractual or financial obligations (e.g., purchased services, subscriptions, or transactions) will not be deleted while these obligations remain valid. These accounts are retained as part of fulfilling contractual duties under Art. 6(1)(b) GDPR and Art. 10 UAE Data Law.

2) Empty or inactive accounts, where:

- no services were purchased,
- no financial or contractual relationship exists,
- and no login or platform activity occurred for more than 24 consecutive months,
- will be automatically deleted. Prior to deletion, users will receive a notification email offering the option to reactivate the account.

3) Transaction and financial records are retained for at least 7 years from the date of the last activity, in compliance with UAE tax and accounting requirements, including obligations under the Federal Tax Authority and Commercial Companies Law.

4) Customer support correspondence or ad hoc inquiries are retained only as long as necessary to respond and resolve the matter, and typically not more than 2 years unless further interaction occurs.

5) Data related to legal disputes or investigations may be retained longer if subject to a legal hold, litigation, or official proceedings, in accordance with Art. 6(1)(c) and (f) GDPR and relevant UAE civil procedure laws.

Periodic Review & Disposal

We conduct regular reviews of all stored personal data. Where retention is no longer necessary for the original purpose and no legal basis for further storage exists, we will either:

- securely delete the data, or
- anonymize it to prevent any further identification of the individual.

YOUR PRIVACY RIGHTS

As a User, you have the following rights:

Right to Access: You have the right to request a copy of the personal data we have collected about you.

Right to Correct: If you believe any of the information we hold about you is inaccurate, you may request corrections.

Right to Delete: You can request the deletion of your personal data unless retention is required by law or necessary for legal claims or obligations.

Right to Restrict Processing: You may request restrictions on how we process your personal data.

Right to object to the processing of your personal data, particularly where it is based on our legitimate interests;

Right to data portability: to request your data in a machine-readable format or have it transferred to another controller;

Right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement. (e.g., your local Data Protection Authority).

Right not to be subject to automated decision-making, including profiling, that produces legal or similarly significant effects (Article 22 GDPR).

If you wish to exercise any of these rights, please contact us at school@dubadu.com.

Your privacy rights may vary depending on your location and applicable local laws.

USE OF AUTOMATED SYSTEMS FOR SECURITY

We do not use your personal data for automated decision-making that produces legal or similarly significant effects. Any use of automated systems (e.g., for spam detection or fraud prevention) is limited to technical filtering and does not involve profiling or behavioral scoring that affects your legal status or rights.

FTC COMPLIANCE

We are committed to complying with the Federal Trade Commission's (FTC) privacy and data protection standards. This means we take necessary precautions to protect your personal data from unauthorized access, use, or disclosure, and ensure transparency in our data collection practices.

DATA SECURITY AND BREACH NOTIFICATION

We take the security of your personal data seriously and implement appropriate safeguards to protect it. In the unlikely event of a data breach involving your personal data, we will comply with applicable data breach notification laws and promptly notify affected users if required by law.

COMPLIANCE WITH GLOBAL DATA PROTECTION LAWS

While our company is registered and operates under the laws of the United Arab Emirates, we recognize that our users may come from different jurisdictions, including the European Union. Therefore, we take steps to ensure compliance not only with the UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection, but also with relevant foreign frameworks such as the EU GDPR, the UK GDPR, and other applicable national laws when we process data of users residing in those regions:

United States: We follow COPPA for users under 13, CCPA for California residents, and other relevant U.S. laws.

European Union: We apply the EU GDPR when processing data of individuals located in the European Union, in accordance with Article 3 of the GDPR.

United Kingdom: We adhere to the UK GDPR, offering similar protections as the EU GDPR.

Canada: We follow PIPEDA, ensuring transparency in how personal data is collected and processed.

Australia: We comply with the Privacy Act 1988, respecting user rights to access and correct their data.

United Arab Emirates: We follow UAE Data Protection Law, safeguarding personal data with appropriate legal measures.

Ukraine: We comply with the Law of Ukraine “On the Protection of Personal Data” (No. 2297-VI) and related subordinate acts.

Kazakhstan: We comply with the Law of the Republic of Kazakhstan “On Personal Data and Their Protection” (No. 94-V of 2013).

Other Jurisdictions: In all other countries, we adhere to local data protection laws, ensuring secure and lawful processing of your personal data.

MINORS' DATA PROTECTION

Our services are intended solely for individuals who have reached the age of majority under the laws of their country of residence. By using our platform, you confirm that you meet this legal age requirement.

We do not knowingly collect or process personal data from individuals who are legally considered minors in their jurisdiction.

If we become aware that we have inadvertently received personal data from a minor without valid legal consent, we will take prompt action to delete such data in accordance with applicable laws.

We are committed to protecting personal data and complying with international data protection frameworks, including the GDPR, COPPA, and other relevant laws.

CHANGES TO CONSENT

You may withdraw your consent for data processing at any time by contacting us or adjusting your cookie preferences.

MANDATORY VS. OPTIONAL DATA PROVISION

Some data fields are required for contractual purposes, for example, payment details for purchases. If you choose not to provide this information, we may be unable to provide access to certain services.

Other fields are optional and used only with your consent. Non-provision of optional data will not affect your use of core platform services.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect legal, technical, or business developments.

When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes. This may include notifying registered users via email or providing a notice on our platform.

The updated Privacy Policy will take effect five (5) business days after the notification has been sent or immediately upon publication on our website, depending on the nature of the changes.

It is your responsibility to review the updated Privacy Policy. By continuing to use the platform after the changes take effect, you signify your agreement to the revised Privacy Policy. If you do not agree with any modifications, you must discontinue using the platform.

The latest version of this Privacy Policy will always be available on our website.

PRIVACY BY DESIGN AND BY DEFAULT

We are committed to the principles of Privacy by Design and by Default. This means that we integrate data protection into every stage of our service and platform development, from initial design to deployment and ongoing operation.

Our commitments include:

1) Data Minimization by Default: We only collect and process the minimum personal data necessary for the specific purpose. Optional features that involve additional data are strictly opt-in.

2) Default Privacy Settings: Users' personal information is not made public by default. Settings that allow data visibility or sharing are disabled unless the user explicitly enables them.

3) Built-in Security Measures: We implement technical and organizational safeguards, such as data encryption, access controls, and security audits, to ensure the safety of your personal data.

4) Early Integration of Data Protection: Data privacy risks are assessed at the design stage of any new product, service, or feature. We proactively identify and mitigate risks before deployment.

5) Regular Review and Improvements: We periodically evaluate our practices and update our systems to ensure continuous compliance with data protection standards.

6) By embedding privacy into the core of our systems and processes, we strive to offer you a secure, transparent, and respectful data experience.

USE OF COOKIES AND ELECTRONIC COMMUNICATIONS (ePrivacy Compliance)

We comply with the requirements of the EU ePrivacy Directive (2002/58/EC) and its national implementations (e.g., the EU Cookie Laws), particularly concerning the storage and access of information on a user's device and the use of electronic communications for marketing purposes.

1) Cookie Consent and Transparency

We use cookies and similar technologies to:

- ensure technical functionality of the website (strictly necessary cookies),
- analyze site performance (analytical cookies),
- enhance personalization and user experience,
- support marketing and advertising efforts.

In accordance with the ePrivacy Directive:

- We do not store or access non-essential cookies on your device without your prior consent.
- Consent is obtained via a cookie banner and/or preference center, where you can accept, reject, or customize your cookie preferences.
- Your cookie choices are recorded and stored for compliance purposes, and you can change them at any time.

For full details on the cookies we use, including purpose, duration, and third-party access, please refer to our Cookie Policy.

2) Electronic Communications and Marketing

In compliance with Article 13 of the ePrivacy Directive and the GDPR:

- We will only send electronic marketing communications (e.g., emails, SMS) if you have provided clear, informed consent (opt-in).
- You can withdraw your consent or unsubscribe at any time by using the links provided in our messages or by contacting us directly.
- We do not send unsolicited marketing communications or pass your contact information to third parties for marketing without your consent.

3) Device Access and Browser Settings

We respect your browser-level settings for privacy and tracking. However, due to current lack of universal enforcement standards, we encourage users to manage preferences via our cookie settings tool.

DATA CONTROLLER

The data controller who is responsible for the processing of your personal data is:

DUBADU PORTAL LLC

License: No. 1410816, issued by the Government of the Emirate of Dubai

Manager: Daria Rohozhynska

Registration Number: 2405242

Address: Deira, Al Khabaisi, Office No. 117, Dubai,
United Arab Emirates

LANGUAGE VERSIONS

This Privacy Policy is available in English. Where required by local law, we provide localized versions. Availability of translations may vary depending on the user's location and applicable legal requirements. In case of discrepancies, the English version shall prevail unless otherwise mandated by applicable law.

CONTACT US

If you have questions, comments or concerns regarding our privacy practices or the privacy policy, or wish to update your data, please contact us at **school@dubadu.com**.

Effective Date: October 23, 2025