

# 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.

## 1. DEFINITIONS

**1.1.** For the purposes of this Privacy Policy, the following terms shall have the meanings set out below and shall be interpreted in accordance with the General Data Protection Regulation (GDPR), where applicable.

**1.2.** Personal Data means any information relating to an identified or identifiable natural person (the “Data Subject”).

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

**1.3.** Processing means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

**1.4.** Data Controller means the natural or legal person which determines the purposes and means of the Processing of Personal Data.

For the purposes of this Privacy Policy, the Data Controller is:

DUBADU PORTAL LLC

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

Manager: Daria Rohozhynska

Registration Number: 2405242

Address: ONTARIO TOWER C1802-114, Business Bay, Dubai, UAE

## 2. COLLECTION OF INFORMATION

### **2.1.** *Contact Information.*

We may collect Personal Data that you voluntarily provide when you fill out a contact form or otherwise communicate with us, including your name, email address, phone number, and any additional information you choose to provide. This information is used to respond to your inquiries and provide the requested services or information.

### **2.2.** *Cookies and Tracking Technologies.*

We use cookies and similar tracking technologies to ensure the proper functioning of the Platform and to enhance user experience.

This includes session cookies, which are temporary and deleted when you close your browser, and persistent cookies, which remain on your device for a defined period or until manually deleted and allow us to remember your preferences for future visits.

We may also use analytical cookies to collect information about how users interact with the Platform, including traffic patterns and user behavior, in order to improve our services and functionality.

Non-essential cookies, including analytical cookies, are used only where you have provided your explicit consent through the cookie banner or preference center. You may withdraw or modify your consent at any time.

For further details, please refer to our Cookie Policy.

### **2.3.** *Payment Information.*

We may collect and process payment-related information for the purpose of facilitating payouts to Users in connection with their participation in the Platform.

This may include bank account details or other payout credentials, as well as limited transaction-related information such as payout confirmations, transaction identifiers, and payment status data.

Payment information may be processed through authorized third-party payment service providers. We do not store full financial account details on our systems unless strictly necessary. Limited information may be retained for accounting, reporting, and fraud prevention purposes.

#### **2.4. Partner Dashboard Activity.**

We may collect information relating to your activity within the Platform, including interactions within the partner dashboard, data related to referred agencies, associated transactions, and performance metrics.

Such information is used for the purposes of administering the Platform, managing your participation in partner programs, generating insights, and improving functionality and user experience.

### **3. LEGAL BASIS AND PURPOSES OF PROCESSING**

**3.1.** We process Personal Data only where a valid legal basis exists under the General Data Protection Regulation (GDPR), depending on the nature of the data and the purposes of processing.

#### **3.2. Account Registration Data.**

Personal Data related to account registration, including name, email address, and phone number, is processed for the purpose of creating and managing user accounts, providing access to the Platform, and delivering services. Such processing is necessary for the performance of a contract in accordance with Article 6(1)(b) GDPR.

#### **3.3. Payment Data.**

Payment-related data, including payout details and transaction records, is processed for the purpose of facilitating withdrawals, maintaining financial records, and complying with applicable legal and tax obligations. This processing is based on the performance of a contract pursuant to Article 6(1)(b) GDPR and compliance with legal obligations under Article 6(1)(c) GDPR.

#### **3.4. Customer Support Data.**

Personal Data contained in communications, including emails, chat messages, and support requests, is processed for the purpose of responding to inquiries, resolving issues, and providing user support. This processing is based on our legitimate interest in ensuring effective customer service in accordance with Article 6(1)(f) GDPR.

#### **3.5. Marketing Communications.**

Personal Data used for marketing purposes, including email, SMS, and push notifications, is processed for the purpose of sending updates, newsletters, and promotional communications. This processing is based on your consent in accordance with Article 6(1)(a) GDPR. You may withdraw your consent at any time without affecting the lawfulness of processing carried out prior to such withdrawal.

#### **3.6. Analytics and Cookies.**

Data relating to device information, usage patterns, and browsing behavior is processed for the purpose of analyzing Platform performance and improving services. Such processing is carried out based on your consent in accordance with Article 6(1)(a) GDPR.

#### **3.7. Security and Fraud Prevention.**

Technical and security-related data, including IP addresses, system logs, and login activity, is processed for the purpose of ensuring Platform security, preventing misuse, and detecting fraudulent activity. This processing is based on our legitimate interest in maintaining a secure and reliable service in accordance with Article 6(1)(f) GDPR.

#### **3.8. Partner Program Data.**

Data related to partner activity, including referral performance, associated transactions, and partner-linked interactions, is processed for the purpose of administering the partner program, providing access to dashboards, and generating performance insights. This processing is necessary for the performance of a contract pursuant to Article 6(1)(b) GDPR and is also based on our legitimate interest in managing partner relationships under Article 6(1)(f) GDPR.

### **3.9. Training Data.**

Data related to training activities, including course progress, viewed materials, and test completion, is processed for the purpose of delivering educational content and monitoring user progress. This processing is necessary for the performance of a contract in accordance with Article 6(1)(b) GDPR.

## **4. SHARING OF DATA**

**4.1.** We do not share Personal Data with third parties except where such disclosure is necessary for the operation of the Platform, compliance with legal obligations, or otherwise permitted under applicable data protection laws.

Where Personal Data is shared, we ensure that such processing is carried out in accordance with applicable legal requirements and appropriate safeguards.

### **4.2. Internal Recipients.**

Personal Data may be accessed by authorized personnel within the Company strictly on a need-to-know basis and subject to confidentiality obligations.

This may include customer support personnel for the purpose of responding to user inquiries and service requests, legal and compliance personnel for the purpose of fulfilling legal obligations and handling disputes or claims, and marketing or product teams where applicable based on consent or legitimate interests, including improving services and user experience.

### **4.3. External Processors.**

We may share Personal Data with third-party service providers acting on our behalf under data processing agreements.

Such providers may include hosting and infrastructure providers responsible for ensuring platform availability, content delivery networks used for efficient delivery of content, email communication services used for transactional and consent-based communications, payment service providers responsible for processing payouts and financial transactions, analytics providers used to understand user interactions and improve the Platform, and security tools used to protect the Platform from abuse or unauthorized access.

All such processors act strictly in accordance with our instructions and are contractually bound to implement appropriate technical and organizational measures to ensure data protection, security, and confidentiality.

### **4.4. External Controllers.**

In certain circumstances, Personal Data may be disclosed to independent third parties acting as separate data controllers.

This may include government authorities, regulators, or law enforcement agencies where disclosure is required by law or in response to lawful requests, as well as professional advisers such as auditors, legal consultants, and tax advisers where such disclosure is necessary to comply with legal obligations or to establish, exercise, or defend legal claims.

### **4.5. International Data Transfers.**

Where Personal Data is transferred outside of the country of origin, including to jurisdictions that may not provide the same level of data protection, we ensure that appropriate safeguards are in place in accordance with applicable data protection laws.

Such safeguards may include the use of Standard Contractual Clauses, reliance on adequacy decisions, or other legally recognized transfer mechanisms.

### **4.6. Partner Program Data.**

In the context of the partner program, certain aggregated or anonymized information relating to performance metrics may be made available to partners.

We do not disclose personally identifiable information relating to third parties without a valid legal basis or, where required, explicit consent.

## **5. DATA RETENTION**

**5.1.** We retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected, as set out in this Privacy Policy, and in accordance with applicable legal and regulatory requirements.

Such requirements may arise under applicable laws of the United Arab Emirates, including Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, Federal Law No. 32 of 2021 on Commercial Companies, and Federal Decree-Law No. 8 of 2017 on Value Added Tax, as well as, where applicable, the General Data Protection Regulation (GDPR).

### **5.2. Active Accounts.**

Personal Data associated with active user accounts is retained for as long as the User maintains an ongoing relationship with the Platform, including where there are active contractual, financial, or program-related obligations.

Such retention is necessary for the performance of a contract and for compliance with applicable legal obligations.

### **5.3. Inactive Accounts.**

Personal Data associated with inactive accounts may be deleted where there is no longer any contractual or financial relationship, no activity has occurred for a continuous period of twenty-four (24) months, and the User has not responded to a prior notification sent to the registered contact details.

Where reasonably practicable, Users will be notified prior to deletion and provided with an opportunity to reactivate their account.

### **5.4. Financial and Transaction Data.**

Financial and transaction-related data is retained for a minimum period of seven (7) years from the date of the last relevant activity, in order to comply with applicable tax, accounting, and regulatory obligations under the laws of the United Arab Emirates.

### **5.5. Customer Support Data.**

Personal Data contained in customer support communications is retained for as long as necessary to handle the request and resolve the matter, and generally not longer than two (2) years, unless further interaction or legal necessity requires extended retention.

### **5.6. Legal Obligations and Claims.**

Personal Data may be retained for a longer period where necessary to comply with legal obligations, to establish, exercise, or defend legal claims, or where subject to legal hold, investigation, or regulatory proceedings.

### **5.7. Data Review and Deletion.**

We conduct periodic reviews of Personal Data to ensure that it is not retained longer than necessary.

Where retention is no longer justified and no legal basis for continued processing exists, Personal Data will be securely deleted or irreversibly anonymized so that it can no longer be associated with an identifiable individual.

## **6. YOUR PRIVACY RIGHTS**

**6.1.** Depending on your location and applicable data protection laws, including the General Data Protection Regulation (GDPR), you may have certain rights in relation to your Personal Data.

### **6.2. Right of Access.**

You have the right to request confirmation as to whether we process your Personal Data and, where that is the case, to request access to such data, including a copy of the Personal Data we hold about you.

### **6.3. Right to Rectification.**

You have the right to request the correction of inaccurate Personal Data and to have incomplete Personal Data completed.

#### **6.4. Right to Erasure.**

You have the right to request the deletion of your Personal Data where there is no legal basis for its continued processing, subject to applicable legal obligations or where retention is necessary for the establishment, exercise, or defense of legal claims.

#### **6.5. Right to Restriction of Processing.**

You have the right to request that we restrict the processing of your Personal Data in certain circumstances, including where the accuracy of the data is contested or where processing is unlawful.

#### **6.6. Right to Object.**

You have the right to object to the processing of your Personal Data where such processing is based on our legitimate interests. In such cases, we will cease processing unless we demonstrate compelling legitimate grounds or where processing is required for legal claims.

#### **6.7. Right to Data Portability.**

You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and, where technically feasible, to have such data transmitted to another data controller.

#### **6.8. Right to Lodge a Complaint.**

You have the right to lodge a complaint with a competent supervisory authority, particularly in the jurisdiction of your habitual residence, place of work, or place of the alleged infringement.

#### **6.9. Rights Related to Automated Decision-Making.**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significant effects, unless such processing is permitted under applicable law.

**6.10.** If you wish to exercise any of your rights, you may contact us at [school@dubadu.com](mailto:school@dubadu.com). We may request additional information to verify your identity before processing your request.

### **7. USE OF AUTOMATED SYSTEMS FOR SECURITY**

**7.1.** We do not use Personal Data for automated decision-making, including profiling, that produces legal effects or similarly significant effects on Users within the meaning of Article 22 of the General Data Protection Regulation (GDPR).

**7.2.** We may use automated systems for technical and security-related purposes, including spam detection, fraud prevention, and system integrity monitoring.

Such processing is limited to technical analysis and does not involve profiling, behavioral scoring, or decision-making that would materially affect a User's legal rights, status, or access to the Platform.

### **8. DATA PROTECTION AND COMPLIANCE**

**8.1.** We implement appropriate technical and organizational measures to protect Personal Data against unauthorized or unlawful access, use, disclosure, alteration, or destruction.

Such measures are designed to ensure a level of security appropriate to the risk, taking into account the nature of the data and the processing activities.

**8.2.** We are committed to processing Personal Data in a transparent and lawful manner in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and relevant legislation of the United Arab Emirates.

### **9. DATA SECURITY AND BREACH NOTIFICATION**

**9.1.** We implement appropriate technical and organizational measures designed to protect Personal Data against unauthorized or unlawful access, disclosure, alteration, or destruction.

Such measures are proportionate to the nature, scope, and purpose of the processing, as well as the risks associated with the processing of Personal Data.

**9.2.** In the event of a personal data breach affecting Personal Data under our control, we will take appropriate steps to identify, contain, and mitigate the impact of the incident.

Where required by applicable law, we will notify affected Users and relevant supervisory authorities without undue delay and in accordance with applicable legal requirements.

## **10. COMPLIANCE WITH GLOBAL DATA PROTECTION LAWS**

**10.1.** While the Company operates under the laws of the United Arab Emirates, the Platform may be accessed by Users from multiple jurisdictions.

We take reasonable steps to ensure that Personal Data is processed in accordance with applicable data protection laws to the extent such laws apply to our activities.

**10.2.** Depending on the location of the User and the nature of the services provided, this may include compliance with the General Data Protection Regulation (GDPR), the UK GDPR, and other applicable data protection or privacy laws.

**10.3.** Where Personal Data is transferred across borders, including to jurisdictions that may not provide an equivalent level of data protection, we implement appropriate safeguards in accordance with applicable legal requirements.

Such safeguards may include the use of Standard Contractual Clauses, reliance on adequacy decisions, or other legally recognized transfer mechanisms.

## **11. MINORS' DATA PROTECTION**

**11.1.** The Platform and its services are intended solely for individuals who have reached the age of majority under the laws of their country of residence.

By accessing or using the Platform, the User represents and warrants that they meet this requirement.

**11.2.** We do not knowingly collect or process Personal Data relating to individuals who are considered minors under applicable laws.

**11.3.** If we become aware that Personal Data has been collected from a minor without valid legal consent, we will take appropriate steps to delete such data without undue delay and, where required, take additional measures to prevent further processing.

## **12. MANDATORY VS. OPTIONAL DATA PROVISION**

**12.1.** Certain Personal Data is required for the performance of a contract and for the provision of the Platform's services. This includes, in particular, data necessary to create and manage a user account, participate in platform programs, and process payments or withdrawals.

Failure to provide such data may result in the inability to access or use certain features or services of the Platform.

**12.2.** Other Personal Data may be provided voluntarily and is processed only on the basis of your consent.

Failure to provide optional data will not affect your ability to use the core functionality of the Platform.

## **13. CHANGES TO THIS PRIVACY POLICY**

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

**13.2.** Where changes are material, we will take appropriate measures to inform Users, taking into account the nature and significance of such changes.

This may include notifying registered Users via email or providing a notice on the Platform.

**13.3.** Unless otherwise specified, the updated Privacy Policy shall become effective five (5) business days after notification has been provided or upon publication on the Platform, depending on the nature of the changes.

**13.4.** Users are responsible for reviewing the Privacy Policy periodically to stay informed of any updates.

Continued use of the Platform after the effective date of the updated Privacy Policy constitutes acceptance of the revised terms.

**13.5.** The most current version of this Privacy Policy will at all times be available on the Platform.

## **14. PRIVACY BY DESIGN AND BY DEFAULT**

**14.1.** We are committed to implementing the principles of privacy by design and by default in accordance with applicable data protection laws.

This means that data protection is integrated into all stages of the Platform's development and operation, including the design, implementation, and ongoing maintenance of our services.

**14.2.** We ensure that only Personal Data that is necessary for specific and legitimate purposes is collected and processed. Where additional data processing is not essential, such processing is limited to optional features and is carried out only on the basis of user consent.

**14.3.** Personal Data is not made publicly available by default. Any settings that allow the sharing or visibility of Personal Data remain disabled unless explicitly activated by the User.

**14.4.** We implement appropriate technical and organizational measures, including access controls, encryption where appropriate, and regular security assessments, to ensure the protection and integrity of Personal Data.

**14.5.** Data protection considerations are incorporated at the earliest stages of development of any new product, service, or feature. We assess potential risks and implement appropriate safeguards prior to deployment.

**14.6.** We conduct periodic reviews of our data protection practices and continuously update our systems and processes to ensure ongoing compliance with applicable data protection requirements.

## **15. USE OF COOKIES AND ELECTRONIC COMMUNICATIONS**

**15.1.** We process Personal Data in connection with cookies and electronic communications in accordance with applicable laws, including Directive 2002/58/EC (ePrivacy Directive) and its national implementations.

**15.2.** We use cookies and similar technologies to ensure the proper functioning of the Platform, to analyze performance, and to enhance user experience.

Non-essential cookies are used only where you have provided prior consent through a cookie banner or preference management tool. Users may withdraw or modify their consent at any time.

Further information about the use of cookies is available in our Cookie Policy.

**15.3.** We send electronic communications, including emails and notifications, only where a valid legal basis exists, including user consent or where otherwise permitted under applicable law.

Users may withdraw consent to receive such communications at any time.

**15.4.** Users may manage or restrict the use of cookies through their browser or device settings. Disabling certain cookies may affect the functionality of the Platform.

## **16. LANGUAGE VERSIONS**

**16.1.** 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](mailto:school@dubadu.com).

*Effective Date:* April 10, 2026