

## 1. INTRODUCTION

Sav Technologies Limited (“Sav”, “we”, “us”) is committed to protecting and respecting your personal data and ensuring that when you choose us to use our services, you know what data we collect about you and how we use and protect that personal data.

As a DIFC registered entity, we must comply with Data Protection Law, DIFC Law No. 5 of 2020 (the “DP Law”), and may for certain types of personal data processing, be subject to laws from other jurisdictions.

As such, it is the policy of Sav to respect the privacy of its website services and app users. In accordance with DP Law and as applicable in our Terms of Conditions, Sav collects information about you when you use or access our websites and other web-based products, information or services (collectively, the “Website Services”) as well as through other interactions and communications you have with us, such as through the Sav Mobile Application (the “App”). This data protection policy (the “Privacy Policy”), along with our privacy notice (collectively the “Policies”) sets out the basis on which any information, including any personal data, we collect from you, or you provide to us, will be processed by Sav. Each time you access or use the Website Services or provide us with information, by doing so you are accepting and, where clearly stated, consenting to the practices described in this Privacy Policy. Please take the time to carefully read and understand our Privacy Policy.

## 2. WHO WE ARE

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of our Website Services and App and applies to persons anywhere in the world who access or use Sav's Website Services or the App (“Users”).

3. Sav Technologies Limited is a technology platform aimed to help you plan, budget and save for your spending goals. Sav works with necessary regulated entities in the UAE which arrange and provide financial services for Users consideration, however Sav is not a bank or financial services provider and doesn't undertake any regulated activities.

## 4. THE DATA WE COLLECT ABOUT YOU

You provide information by filling in forms on our App or any Sav -owned Website Services, or by corresponding with us for example by telephone, e-mail or any other digital or electronic form. You may provide information when you are registering using the Sav-provided online client portal, or downloading and registering to use the App, or where you are searching for the App in app stores (including but not limited to the Apple App Store and the Google Play Store). You may also share data via the App's social media functions, or when you report a problem with the App, or any of our Website Services. If you contact us, Sav will keep at least an electronic record of such correspondence, including relevant personal information shared at that time. The personal information you give us may include your name, address, e-mail address and phone number, certain device information, username, password, residential building, work address, photograph and other registration information you choose to provide (“Personal Information” or “Personal Data”). It may also include balance and transaction data, including but not limited to your transaction information such as the value, merchant, merchant type, credit or debit type, and dates and times of transaction.

The Website Services or App collects and processes Personal Data for specific, lawful purposes such as for our obligations in compliance with anti-money laundering regulations. We may also process your data to enter a contract with you or for delivery of the contract you have already entered with us, or for the performance of tasks carried out in the interests of Sav. Some data we collect will be

mandatory data. Where we require your Personal Information for legal reasons or for another mandatory reason, where we will advise you of the possible effects of not providing us with Personal Information.

Apart from providing information for specific services or purposes as directed by Sav, processing User-provided contributions of content or contact information regarding or about children are expressly prohibited.

## **COOKIES**

A cookie is a small text file that is unique to the web browser on your computer or mobile device, which is used to retain user preferences, and enhance browsing experience ("Cookie"). Sav uses Cookies to track overall site usage and enables us to provide a better user experience. We do not use Cookies to "see" other data on your computer or determine your email address.

Types of cookies we drop and the information collected using them include:

### ***Essential***

- Google Tag Manager – helps make tag management simple, easy and reliable by allowing marketers and webmasters to deploy website tags all in one place.

### ***Site Analytics***

- Google Analytics – gives website owners the digital analytics tools needed to analyse data from all touchpoints in one place, for a deeper understanding of the customer experience.
- Pingdom – monitors sites and servers on the internet, alerting the website owners if any problems are detected.
- Hotjar – by combining both analysis and feedback tools, Hotjar helps website owners understand what users want, care about and interact with on their website by visually representing their clicks, taps and scrolling behavior.

### ***Advertising***

- DoubleClick – a subsidiary of Google which develops and provides Internet ad serving services.
- Twitter Advertising – enables website owners to track and measure the actions users take after viewing or engaging with ads on Twitter.
- Facebook Advertising – lets website owners measure, optimise and build audiences for advertising campaigns.
- LinkedIn Analytics – enables website owners to promote their company updates to targeted audiences on desktop, mobile, and tablet.

Most browsers accept and maintain Cookies by default. Check the 'Help' or 'Settings' menu of your browser to learn how to change your Cookie preferences. You can choose to alter Cookies settings related to the use of our Website Services, but this may limit your ability to access certain areas of the Website.

Alternatively you may wish to visit an independent source of information, [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to alter settings or delete Cookies from your computer as well as more general information about Cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual or network operator for advice.

#### *Processing, Storage and Transfer of Personal Data*

We will take all steps reasonably necessary to ensure your data is processed fairly and lawfully, in accordance with the DP Law, other applicable laws and this Privacy Policy. By submitting your Personal Data (including Log, Device and / or Demographic Information), you agree to such transfer, storing or processing in order for Sav to perform its general administrative and regulatory functions, including but not limited to responding to enquiries you raise via the App or Website Services or maintaining contacts for future informational or promotional activities. Unless otherwise notified, Sav does not ordinarily engage in automated decision making when processing your Personal Data.

You agree that we have the right to transfer the Personal Data described in this Privacy Policy to and from, and process and store it in, the United Arab Emirates and (where applicable or required) with processors in other countries, some of which may have less protective privacy laws than those where you reside. Where this is the case, we will take appropriate security measures to protect your Personal Data in accordance with this Privacy Policy. All information security policies are strictly enforced. Please see section 7 below for further details.

To preserve the integrity of our databases, to carry out on-going Website Services on behalf of all Users, for research, analytics and statistics purposes and to ensure compliance with applicable laws and regulations, we retain Personal Data submitted by Users for a reasonable length of time unless otherwise prescribed by applicable law. Sav is not responsible for the accuracy of the information you provide, and will modify or update your Personal Data in our databases upon your request, as further outlined below.

We will erase or archive from active use your Personal Data upon request, unless we are required to retain it in accordance with Sav or other applicable laws or to perform agreed services. By accessing or using the App or Website Services, you do hereby represent and warrant that you understand that all information submitted by you through the App or Website Services or otherwise to Sav may be used by Sav in accordance with applicable laws and its policies.

#### *Information we collect about you and your device*

*Each time you use our Website Services or App we will automatically collect the following information:*

- technical information, including the type of mobile device you use, a unique device identifier (for example, mobile network information, your mobile operating system, the type of mobile browser you use, device token, device type, time zone setting (“Device Information”));
- details of your use of our Website Services or App including, but not limited to traffic data, weblogs and other communication data, and the resources that you access (“Log Information”).
- location information, if the Website Services or App uses GPS technology to determine your current location. If you wish to use the particular feature, you may be asked to

consent to your data being used for this purpose. You can alter your consent and sharing selections at any time via your mobile device settings.

#### *Other information we may collect through your use of the Website Services or the App*

When you use any Website Services or the App, we may collect Personal Information as well as demographic information, for example information that you submit, or that we collect, which may include, but is not limited to, postcode, hometown, gender, username, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, device location, IP address, SMS data, transaction information, age/birth date, browsing history information, searching history information, and registration history information (“Demographic Information”).

### **5. USE OF PERSONAL DATA**

We may use Personal Data which you provide to us or we collect from you to:

- Provide, maintain, and improve our App and Website Services, including, for example, to facilitate payments, send receipts, provide products and services you request (and send related information about them), develop new features, provide customer support, authenticate Users, send administrative messages and contact you (including by telephone) for feedback about our services;
- Perform internal administration and operations, including, for example, to prevent fraud and abuse of our Website Services, to troubleshoot software bugs and operational problems, to conduct data analysis, testing and research, or to monitor and analyze usage and activity trends;
- Send you communications we think will be of interest to you, including information about products, services, promotions, news, and Sav events, and to process contest, sweepstake, or other promotion entries and fulfill any related awards;
- Notify you about changes to our App and Website Services;
- Allow you to participate in any interactive features of our App or Website Services;
- Keep our App and Website Services safe and secure; and
- Personalize and improve the App and Website Services, including to provide or recommend features, content, social connections, referrals, and advertisements.

### **6. PROCESSING, STORAGE AND TRANSFER OF PERSONAL DATA**

We will take all steps reasonably necessary to ensure your data is processed fairly and lawfully, in accordance with the DP Law, other applicable laws and this Privacy Policy. By submitting your Personal Data including your Log, Device and / or Demographic Information, you agree to us transferring, storing or processing your data as listed in section 4.

You agree that we have the right to transfer the Personal Data described in this Privacy Policy to and from, and process and store it in, the United Arab Emirates and, where applicable or required, with processors in other countries, some of which may have less protective privacy laws. Where this is the case, we will take appropriate security measures to protect your Personal Data in accordance with this Privacy Policy. We will only transfer your data where we have a processor agreement, or other suitable contract in place, or where we have a safeguard to transfer your data. In limited circumstances, we may rely on a legal derogation under the DP Law.

We retain Personal Data submitted by Users for a reasonable length of time unless otherwise prescribed by applicable law. We will consider the type, age, amount, and general sensitivity of data to assist us to determine the retention period relevant to your data. Sav will endeavor to keep your information up to date but will rely on the accuracy of the information you provide, and will modify or update your Personal Data in our databases upon your request, as further outlined below.

Unless otherwise notified, Sav does not ordinarily engage in automated decision making when processing your Personal Data.

All information security policies are strictly enforced. Please see section 7 below for further details.

## 7. SHARING OF PERSONAL DATA

We may share Personal Data which we collect about you as described in this Privacy Policy or as described at the time of collection or sharing, including as follows:

*Through our Website Services or the App*

We may share your Personal Data:

- With third parties to provide you a service you requested through a partnership or promotional offering made by a third party or us; and,
- With third parties with whom you choose to let us share your Personal Data, for example other apps or websites that integrate with our API or Website Services, or those with an API or Service with which we integrate;

## 8. OTHER TYPES OF DATA SHARING

We may share your Personal Data:

- With Sav subsidiaries and affiliated entities;
- With vendors, consultants, marketing and advertising partners, and other service providers who need access to such Personal Data to carry out work on our behalf or to perform a contract we enter into with them;
- In response to a request for information by a competent authority or government entities if we determine that such disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process;
- With law enforcement officials, government entities or authorities, or other third parties as required by applicable law;
- With third parties in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
- If we otherwise notify you and you consent to the sharing;
- With third parties in an aggregated and/or anonymized form which cannot reasonably be used to identify you.

## 9. YOUR RIGHTS AND CHOICES

### *Marketing and opting out*

Sav supports Users' legal rights to opt-out of receiving communications from us and our partners. You have the option to ask us not to process your Personal Data for marketing purposes and to remove it from our database, to not receive future communications or to no longer receive our App or Website Services.

You may change your preferences at any time.

Please note that we may continue to send you transactional or service-related e-mails despite your desire to not receive promotional or marketing e-mail messages .

While we may remove your individual contact information from our professional contacts database, please be aware that if such information is in a different third party's marketing directory through your request or election, you will need to request removal with such third party directly.

### *Access to and correction of your Personal Information*

You have the right to access information held about you. Your right of access can be exercised in accordance with DP Law and other applicable laws. Any access request generally comes at no cost to you but, in limited circumstances, we may either charge a fee where the requests is considered manifestly unfounded or excessive to meet any extraordinary administrative costs or refuse to act on your request.

When you contact us about a potential Personal Data error, we will confirm or verify the information in question, then correct verified inaccuracies and respond to the original inquiry. We will send a correction notice to businesses or others whom we know to have received the inaccurate data. However, some third parties and third party sites may continue to process inaccurate data about you until their databases and display of data are refreshed in accordance with their update schedules, or until you contact them personally to ensure the correction is made in their own files.

### *Restriction of your Personal Information*

You have the right to request a restriction of your Personal Information, and in most circumstances, we will only store your data unless we need to use it for the establishment, exercise or defense of a legal claim, for the protection of the rights of another natural person, or in the public interest. You may request a restriction of your data where you contest the accuracy of your data while we work to verify the data source, where you oppose to our data erasure and you request the restriction of your data instead, where your data is required for a legal reason, or where your data is pending verification as to whether we can retain the data in our legitimate interest.

### *Erasure of your Personal Information*

You may request for your data to be erased, which is also known as your 'right to be forgotten'. You can successfully exercise this right where we no longer have a legal reason under the DP Law to hold your data unless we are required to retain your data for the establishment or defense of legal claims. We will action all requests in accordance with the DP Law.

### *Portability of your Personal Information*

You have the right to receive data you have provided directly to us in a structured, commonly used and machine-readable format where we collected the data relying on your consent, and the data was processed by automated means.

### *Right to withdraw consent*

On occasion we will rely on consent to process your personal data. Where we rely on this consent to process your Personal Information, we will endeavor to ensure that our consent is valid and you have the right to revoke your consent at any time by contacting us.

## **10. SECURITY PRECAUTIONS**

Sav has established policies and procedures for securely managing information and protecting Personal Data against unauthorized access. We continually assess our data privacy, information management and security practices. We do this in the following ways:

- Establishing policies and procedures for securely managing information;
- Limiting employee access to viewing only necessary information in order to perform his or her duties;
- Protecting against unauthorized access to Personal Data by using data encryption, authentication and virus detection technology, as required;
- Requiring service providers with whom we do business to comply with relevant data privacy legal and regulatory requirements;
- Monitoring our websites through recognized online privacy and security organizations;
- Conducting background checks on employees and providing training to our employees.

11. If you have any further questions about our security and processing activities, please contact the Data Protection team / Officer or refer to our Terms and Conditions. To the extent permitted by applicable law, Sav expressly disclaims any liability that may arise should any other third parties obtain the Personal Data you submit. Users should be aware that no data transmission over the internet can be guaranteed to be 100% secure. As a result, Sav cannot warrant or guarantee the security of any Personal Data you transmit to us, and you do so at your own risk.

## **12. EXTERNAL LINKS**

The Website and the App may contain links to other websites on the Internet that are owned and operated by third parties (the "External Sites"). These links are provided solely as a convenience to you and not as an endorsement by Sav of the contents of or reliability on such External Sites. You acknowledge that Sav is not responsible for the availability of, or the information and content of any External Site. You should contact the site administrator or webmaster for those External Sites if you have any concerns regarding such links or the content located on such external Sites. If you decide to access linked third party websites, you do so at your own risk. Sav does not accept liability, and shall not be liable to you for any loss or damage arising from or as a result of your acting upon the content of another website to which you may link from the Website Services or the App.

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

We may change this Privacy Policy from time to time and without notice. If we make significant changes in the way we treat your Personal Data, or to the Privacy Policy, we will endeavor to provide you notice through the App or Website Services or by some other means, such as email. Your continued use of the App or Website Services after such notice constitutes your acceptance of the changes. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. We provide links to it through:

- The App or Website Services;
- Reference it in our Terms of Use; or,
- Our contracts, agreements, and other documents, as necessary or appropriate.

#### 14. CONTACT US

If you have any questions, comments and requests related to the Policies, or if you have any complaints related to how Sav processes your personal data, please contact us at [support@sav.money](mailto:support@sav.money)

If you think there is a problem with the way we are handling your data, you have the right to complain to the DIFC Commissioner of Data Protection.

#### **DIFC Data Protection Office**

Dubai International Financial Centre Authority

Level 14,

The Gate Building

DIFC, UAE

+971 4 362 2222

[commissioner@dp.difc.ae](mailto:commissioner@dp.difc.ae)