

Introduction

Alef Education are committed to protecting your personal data and respecting your privacy. This policy (together with our end-user terms of service as set out at [\[LINK\]](#) (**Terms of Service**) applies to your use of:

- Arabits mobile application software (**App**) available through play store, app store or other available distribution platform (**Appstore**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**) that are available on the App or other sites of ours (**Services Sites**). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- If you are under 18 or the legal age of majority in your jurisdiction, your parent or guardian must provide consent for you to download the App and use the Services in accordance with this policy. We advise parents and guardians who permit their children to use the Services to communicate with their children about their safety online.
- Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [\[LINK\]](#).

[Important information and who we are](#)

[the data we collect about you](#)

[how is your personal data collected?](#)

[how we use your personal data](#)

[disclosures of your personal data](#)

[international transfers](#)

[data security](#)

[data retention](#)

[your legal rights](#)

[glossary](#)

[description of categories of personal data](#)

Important information and who we are

Alef Education Consultancy LLC is responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this policy) and is defined as a 'controller' under some data protection laws (such as the General Data Protection Regulation 2006/679 (GDPR)).

Contact details

Our full details are:

- Full name of legal entity: Alef Education Consultancy LLC, a company registered in Abu Dhabi with commercial license CN-2209313
- Email address: privacy@alefeducation.com

- Postal address: PO Box 769719, Abu Dhabi, United Arab Emirates

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on 15 October 2020. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of the Services Sites. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data.
- Contact Data.
- Transaction Data.
- Log Data.
- Content Data.
- Profile Data.
- Usage Data.
- Communications Data.
- Voice Data.

We explain these categories of data [here](#).

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any other Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and other biometric data used for identification purposes). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, and Communications Data) you consent to giving us about you by filling in forms on the App and the Services Sites (together **Our Sites**), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App purchase or enter a competition, promotion or survey and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you visit one of Our Sites or use one of our Apps we will automatically collect personal data including Device, Content and Usage Data.
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you such as Contact and Transaction Data from providers of technical, payment and delivery services such as the Appstore;
- **Unique application numbers.** When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Log	Your consent Necessary for our legitimate interests (to confirm your identity)
To process in-App purchases and deliver Services including access to premium content.	Identity Contact Transaction Log Communications	Your consent Performance of a contract with you
To manage our relationship with you including notifying you of changes to the App or any Services and deal with any feedback or complaints	Identity Contact Profile Communications	Your consent Performance of a contract with you

		<p>Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services)</p> <p>Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions and to administer any feedback or complaints)</p>
To administer and protect our business and this App including troubleshooting, data analysis and system testing	<p>Identity</p> <p>Contact</p> <p>Log</p>	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver and enable you to use the content and Services and to monitor trends so we can improve the App	<p>Identity</p> <p>Contact</p> <p>Device</p> <p>Content</p> <p>Profile</p> <p>Usage</p> <p>Communications</p> <p>Voice</p>	<p>Consent</p> <p>Necessary for our legitimate interests (to enable us to provide our products/Services to you including optional functions which assist your learning and to study how you use the Arabits App and make improvements to it)</p>

Disclosures of your personal data

We take any request to share your personal data very seriously and any approval for data sharing only takes place after an assessment is undertaken on a case by case basis.

When you consent to providing us with your personal data, you also consent to share your personal data with the third parties set out below for the purposes set out in the table above:

- Alef Education may also share Personal Data with its service providers to help enable it to provide its products/services to Clients and End Users. A list of Alef Education's Approved Sub-processors is below:

Name	Location	Services
Amazon Web Services (AWS)	Frankfurt, Germany	AWS provides Alef Education hosted cloud services for the processing of user data.
Smartsupp s.r.o (Smartlook)	Czech Republic	To provide analytical services on user data

Note: We require all third parties to respect the security of personal data it shares and to treat it in accordance with the law. We do not allow its third-party service providers to use personal data for their own purposes and only permits them to process your personal data for specified purposes in accordance with this privacy policy and our instructions.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We may also disclose your personal data to a third party to comply with applicable laws or regulations, or a valid legal request. If we are going to release personal data in this instance, we will use reasonable attempts to provide you with notice in advance by email, unless we are prohibited from doing so by law or otherwise where it is impracticable to do so in the circumstances.

International transfers

We will process your personal data in the United Arab Emirates but the data will be hosted on servers in Europe. Notwithstanding the foregoing, when using the Services and interacting with us, your personal data may be transferred outside of your home country and may be stored in and accessed from multiple countries in compliance with applicable laws.

Some of Alef Education external third party service providers are also based in jurisdictions outside of your home country and therefore the processing of your personal data may involve a transfer of data outside of your home country. Whenever we transfer personal data to another jurisdiction, we ensure a similar degree of protection is afforded to it and we ensure that it follows any data protection laws governing the transfer to and from of personal data outside of specific jurisdictions.

Data security

All information you provide to us is stored on our secure servers. Any payment transactions are carried out with the Appstore directly and we do not have access to any of your Financial Data. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way such encryption in transit and at rest.

However, no security measures are perfect and we cannot ensure or warrant the security of any or all of the information that is shared by you. In the event that any personal data is compromised as a result of a breach of security, we will take steps to investigate the situation and may notify the you of the security incident in accordance with applicable laws and regulations.

Data retention and requests for deletion

In the event that you delete your account we will also delete your personal data within 60 days. During this period you may reactivate your account without loss of data.

Where we are required to do so by law, we will retain basic information about you after you delete your account. In limited circumstances we may also retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data: see [below](#) for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, data protection laws (such as the GDPR) may give you rights in relation to your personal data.

These rights differ based upon local data protection laws of your country, state, or territory, but these rights may include one or more of the following:

- ✓ ask if we hold personal data about you and request copies of such personal data and information about how it is processed (also called an **access request**);
- ✓ request that inaccurate personal data is corrected (also called a **rectification request**);
- ✓ request deletion of personal data that is no longer necessary for the purposes of the processing, processed based on withdrawn consent, or processed in non-compliance with applicable legal requirements (see [above](#) for more information);
- ✓ request that we restrict the processing of your personal data where the processing is inappropriate or not as anticipated;
- ✓ object to the processing of your personal data;
- ✓ request portability of your personal data (which does not include information derived from the collected personal data), where the processing of such personal data is based on consent or a contract with you and is carried out by automated means; and
- ✓ lodge a complaint with the relevant local supervisory authority.

Please consult your local data protection laws to determine what rights may be available to you and which exceptions may apply. If you want to make an **access request** or a **rectification request**, you can do this by contacting Alef Education, via the helpdesk using the following email address service@arabits.app. For all other rights under applicable law, you can exercise your rights by contacting us by email at privacy@alefeducation.com. Alef Education endeavours to comply with these requests within one calendar month of your request, however in certain circumstances it may take longer if your request is complex or excessive. If this is the case, we will let you know.

Glossary

Lawful basis

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to

by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Description of categories of personal data

Identity Data: first name, last name, username or similar identifier and, optionally, your school grade.

Contact Data: email address.

Financial Data: bank account and payment card details.

Transaction Data: includes details about payments to and from you and details of in-App purchases.

Log Data: includes your internet protocol (IP) address, log-in data, device information and version, time zone settings and location.

Profile Data: includes your username and password, in-App purchase history, your interests, interactions, preferences, searches progress within the app, assessment test results, feedback responses.

Voice Data: Your microphone recordings that you provide through your device when using certain features.

Usage Data: includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, the resources that you access, traffic data and other communication data, whether this is required for our own billing purposes or otherwise.

Communications Data: includes communications that are sent and received relating to the Services by email, feedback forms or other communication methods.