

# PRIVACY POLICY

## 1. DEFINITIONS

### 1.1. DATA CONTROLLER (WE, US, OUR)

Shattara AI LLC as an entity processing your personal data.

Shattara acts as a data controller for the processing of your personal data in the following situations:

- WHEN YOU VISIT OUR WEBSITE (cookies and similar tracking technologies)
- WHEN YOU CREATE AN ACCOUNT for our User Service and use our User Service
- WHEN YOU COMMUNICATE WITH US
- WHEN YOU ARE SUBJECT TO DIRECT MARKETING
- IF YOU VISIT OUR SOCIAL MEDIA PLATFORMS (Facebook, Instagram, Twitter)
- WHEN YOU REPRESENT A SUPPLIER, VENDOR OR OTHER THIRD PARTY

Below, you can read more about the various purposes of our processing of your personal data in the different situations. You can also see which data we process, what the legal basis for our processing is, for how long we store the personal data and who we share it with.

### 1.2. DATA SUBJECT

You as a user of our website or Customer of our Platform

### 1.3. PROCESSOR

Means companies processing personal data on behalf of Us.

### 1.4. WEBSITE

Means our website at shattara.com and other sites and apps we operate.

### 1.5. PLATFORM

The online contract drafting and management system provided by us

### 1.6. SERVICES

Services and solutions delivered by us to you.

## 2. GENERAL

### WHO PROCESSES THE DATA?

Your data is processed by us, Shattara AI LLC, a company registered in the Kingdom of Saudi Arabia with commercial registration number [YOUR CR NUMBER].

## HOW TO CONTACT US?

You may contact us by sending an email to [support@shattara.com](mailto:support@shattara.com)

## 3. WHEN, WHY, WHAT, AND FOR HOW LONG WE PROCESS YOUR DATA

For more information on our use of cookies on our website, please visit our cookie policy

### 3.1. WHEN YOU VISIT OUR WEBSITE

When you visit our website, we use cookies and similar tracking technologies to collect data about your visits, including e.g. your navigation on the website or in the app, the type of browser or device you use and your IP address. These data may contain personal data.

For the website, we collect the data in order to ensure a stable, secure and user-friendly experience on our website, as well as to keep statistics about our website visitors. In some cases, data is processed in order to target marketing based on the web browser behavior.

The legal bases for our processing are:

- For necessary (technical) cookies on the website: our legitimate interest in ensuring functionality and security of our website, in compliance with the Saudi Electronic Transactions Law and the Saudi Anti-Cyber Crime Law
- For other cookies and similar technologies on the website: your consent, in accordance with the Saudi Communications and Information Technology Commission (CITC) regulations

We disclose information about your use of the website to any third-party service providers that you have allowed to place cookies and/or similar tracking technologies when you use the website or apps. If you have given your consent, such third parties include:

- Facebook Saudi Arabia Limited – see privacy notice [here].
- Google LLC – see privacy notice [here].

Personal data contained in cookies will be deleted in accordance with the lifetime/period for each specific cookie. Read more about our cookies, including their lifetime and the specific third-party providers (i.e. the recipients), in our Cookie Policy. You can read more about the processing of your personal data at the third-party provider's own privacy notices (see links above).

### 3.2. WHEN YOU CREATE AN ACCOUNT FOR OUR PLATFORM

When you create an account to access our Platform, you will be asked to enter your name, selected educational information, contact information, email address and a password chosen by you. We collect such information from you in order to provide you access to our Platform and to make sure that your access account is secured by your own individual password. In addition, we will have access to information regarding your geographical location.

With regard to users with a paid subscription to our Platform (including those starting on a free trial basis, where offered), we will also be collecting payment information in order to provide you access to your subscription. However, as Shattara cooperates with third party payment service providers who operate independently in systems separated from Shattara, no complete payment data, such as complete credit card numbers, will be stored by Shattara.

Further, where the option is available, you may choose to provide us with additional information about your age, gender, university, level of ambition, courses etc. We collect such additional information from you in order to provide the best possible customized user experience and learning journey. However, such information is not required and fully optional.

In addition, we will have access to information regarding how you engage with our Platform, including what content you have interacted with. This includes processing technical data (such as unique platform ID, device IP address). We collect such information from you in order to improve your use of our Platform, including to make suggestions for improved learning and to analyze engagement with our Platform.

Personal data processed: i) in order to deliver our Platform, including personal data that you choose to provide us with in order to receive our Platform is based on the necessity for the performance of a contract with you, in compliance with the Saudi Electronic Transactions Law. Personal data processed in order to analyze your use of our Platform and measure the success of campaigns is based on our legitimate interests in operating and developing our Platform, in accordance with Saudi data protection principles.

We only keep your data for as long as they are of relevance to us and we have a legitimate purpose for keeping them. Your data will therefore be deleted in accordance with applicable Saudi data protection legislation and as a general rule your data will be deleted 5 years after the end of the financial year in which you choose to unsubscribe from our Platform, in order to facilitate any decision by you to restore your subscription. This length of time is chosen as this allows students to be able to subscribe and unsubscribe to our Platform throughout their education (e.g., during summer break) without losing all previous data, as this is part of the value proposition of the Platform (e.g., tracking learning progression).

In specific situations, we may defer from our general retention periods (in case of e.g. complaints, objections or other specific situations).

We disclose personal data included in our account records to the relevant Saudi public authorities, including the tax and zakat authorities, in connection with our statutory bookkeeping etc.

Further, we disclose your personal data to the service providers for the online payments company that we use. Finally, we make your personal data available to our group companies and processors who e.g. host, develop and support our IT systems and provide analytics services connected to our Platform. Please see below regarding transfer of your personal data to third countries.

### **3.3. WHEN YOU UPLOAD MATERIAL TO OUR PLATFORM**

When you upload learning materials to our platform, we read the content of the material and share it with OpenAI. The material is subject to the terms of use and privacy of OpenAI:

<https://openai.com/policies/>. OpenAI does not store the data uploaded to their model via our Platform, nor do they train their models on the data. Please refer to our Terms of Use, regarding the required ownership rights of the material that you upload.

We only keep your data for as long as they are of relevance to us and we have a legitimate purpose for keeping them. Your data will therefore be deleted in accordance with applicable Saudi data protection legislation and as a general rule your data will be deleted 5 years after the end of the financial year in which you choose to unsubscribe from our Platform, in order to facilitate any decision by you to restore your subscription.

Before uploading material to the platform, we recommend that you ensure that the material does not contain any sensitive personal information. Neither Shattara or OpenAI stores the input files you upload to the platform.

### **3.4. WHEN YOU USE THE AI-CHAT FUNCTION ON OUR PLATFORM**

When you use the chat-function on our Platform we store the conversation in order to improve your user experience and to improve our Platform. Your messages are sent to OpenAI for processing, but are not stored with them nor used for training purposes. See the terms of use and privacy of OpenAI:

<https://openai.com/policies/>.

### **3.5. WHEN YOU COMMUNICATE WITH US**

When you communicate with us (e.g., via email) your communication will contain personal data, e.g., your contact details (including name and email address) and other personal data you may provide us with.

We process these personal data for the purpose of managing and answering your inquiries. The legal basis for the processing is our legitimate interests in managing general inquiries, in accordance with Saudi data protection principles.

We only keep your data for as long as they are of relevance to us and we have a legitimate purpose for keeping them. Your data will therefore be deleted in accordance with applicable Saudi data protection legislation. Personal data pertaining to our general communication with you (such as email inquiries) will be deleted 5 years after the end of the financial year where your last inquiry has been handled/concluded.

In specific situations, we may defer from our general retention periods (in case of e.g. complaints, objections or other specific situations).

### **3.6. WHEN YOU ARE SUBJECT TO DIRECT MARKETING**

When you subscribe to the newsletter about our User Service or other marketing communications (e.g. for news / offers regarding an upcoming launch of new features to our Services), we register your name, email address and, in the case of users of our User Service, any preferences you may have given (e.g.,

education). The latter involves that we, based on your profile, including your geographical location and the preferred content, are able to better target our marketing. Further, we process these personal data for the purpose of being able to send you targeted communications.

The legal basis for our processing is the consent you have given in accordance with the Saudi Anti-Spam Law and the Saudi Anti-Cyber Crime Law.

We stress that you at any time have the right to object to our processing of your personal data concerning marketing, including our profiling related to such direct marketing. Further, you have the right to withdraw your consent at any time. See our contact information below under "Contact details".

Personal data pertaining to our distribution of marketing communications will be deleted 2 years after our last marketing communication has been distributed, unless you have withdrawn your consent (i.e., unsubscribed) before such time.

We make your personal data available to our group companies and processors who e.g. host, develop and support our IT systems. Please see below regarding transfer of your personal data to third countries.

### **3.7. WHEN YOU VISIT OUR SOCIAL MEDIA PLATFORMS (e.g., Facebook, Instagram, LinkedIn, TikTok, YouTube)**

If you visit our account on platforms at, e.g., Facebook, Instagram, Twitter, Youtube or TikTok we may process the personal data that you have available to us via the specific settings, your reactions on content, including likes and comments, and any sharing of our content etc.

We process these personal data for the purpose of managing our social media platforms and communicating with you through these platforms. The legal basis for the processing is our legitimate interests in accordance with Saudi data protection principles.

We only keep your data for as long as they are of relevance to us, and we have a legitimate purpose for keeping them. Your data will therefore be deleted in accordance with applicable Saudi data protection legislation. Personal data pertaining to our social media platforms, that we are in control of, will be deleted 5 years after the end of the financial year in which such personal data was collected.

Please note that when using our social media platforms, the provider (such as e.g., Facebook) will also process your personal data for its own purposes, including for targeted marketing purposes. You may find further information on these processing activities at the provider's own privacy notices.

## **4. HOW WE KEEP YOUR DATA SAFE**

We have taken reasonable organizational, technical, and administrative measures to protect your personal data in compliance with the Saudi Anti-Cyber Crime Law. We further describe here how we ensure that your personal data is retained in a safe and secure manner.

- WE ENCRYPT THE DATA whenever appropriate

- WE USE LOGGING of access and use of the personal data when relevant
- WE RETAIN APPROPRIATE BACKUPS of the personal data
- WE REGULARLY TEST, ASSESS, AND EVALUATE our privacy measures

We do our utmost to ensure the safety and security of data transmission, but as the internet is not a 100% secure environment, we kindly ask you to take appropriate precautions. For example, if you send us an unencrypted email, we advise you not to send any confidential or sensitive information, as we are unable to guarantee confidentiality.

## **5. PROCESSORS**

We use Processors to help us deliver our services to you, for example, to provide the hosting environment for our product, send out newsletters, and help us run our website, etc.

We make sure that there is an agreement in place regarding how our processors handle the data on our behalf. We'll also ensure that they imply appropriate security measures.

You can find the agreements (called "Data Processing Agreements" or "Data Processing Addendum") in the list below:

- Payment Gateway Provider
- Google
- Mailchimp
- OpenAI
- Digital Ocean
- GitHub
- Slack
- Oracle
- Accounting Software

In the event that we are involved in a bankruptcy, merger, acquisition, or reorganisation, the data may be transferred as part of that transaction.

### **5.1. TRANSFER OF YOUR PERSONAL DATA TO THIRD COUNTRIES**

We transfer your personal data to countries outside Saudi Arabia, when making data available to our processors in various third countries.

The basis for such transfer is either:

- Data processing agreements with standard contractual clauses in accordance with Saudi data protection principles, or
- An adequacy decision based on Saudi data protection principles.

If you want additional information about our transfer of personal data outside Saudi Arabia, including a copy of the relevant security measures, etc., you may make a request for such additional information by contacting us (see contact information below).

## 6. YOUR RIGHTS

As a Data Subject you have a number of rights in accordance with Saudi data protection principles, and this section describes the rights and how to exercise them:

- A. ACCESS THE DATA: You have the right to ask us for copies of your personal data
- B. ERASURE: You can ask us to erase your personal information in certain circumstances
- C. RESTRICT PROCESSING: You have the right to ask us to restrict the processing of your information
- D. DATA PORTABILITY: You have the right to receive the data in a structured, commonly used and machine-readable format
- E. RECTIFICATION: You may ask us to rectify information that is inaccurate
- F. CONSENT WITHDRAWAL: If processing is based on your consent, you have the right to withdraw consent at any time
- G. OBJECT PROCESSING: You have a right to object to the processing of your personal data
- H. ASSISTANCE AND INFORMATION: You have the right to contact us and request more information about how we process your personal data

## 7. COMPLAINT TO A SUPERVISORY AUTHORITY

If you want to lodge a complaint about our processing of your personal data, you can do so by contacting the Saudi Data & AI Authority (SDAIA) via their website, [www.sdaia.gov.sa](http://www.sdaia.gov.sa).

Please contact us if you wish to exercise your rights. The relevant contact details are stated below.

## 8. CONTACT DETAILS

If you have any questions about how we process personal data, please contact us.

Shattara AI LLC

[YOUR ADDRESS],

Riyadh, Kingdom of Saudi Arabia

Commercial Registration Number: [YOUR CR NUMBER]

E-mail: [support@shattara.com](mailto:support@shattara.com)