Privacy Policy

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Last updated: October 10, 2020

1. Introduction

1.1. This Privacy Policy ("Policy") is issued by PeopleOS FZ-LLC ("Company", "We", or "us") in respect of the operation of the Services (as defined below) and the Platform, with its registered office at Office B,3305-001-002-003-004-005-006-007-008-009-010-011-012-013-014-015-016, UAE.

1.2. This Policy governs the collection, use, storage, and disclosure of personal data when you use our mobile application ("the App"), the website https://peopleos.io/ ("the Website") ("the Platform") and any related services (collectively, the "Services").

1.3. We are committed to processing personal data in a lawful, fair, and transparent manner. The purpose of this Policy is to inform you, the data subject, in accordance with applicable data protection laws, about how we collect, use, disclose, and retain personal data, your rights regarding your personal data, how you can contact us about your data, and how we protect and manage your information.

1.4. By downloading, installing, or using the Services, or otherwise completing the registration process, you acknowledge that you have read and understand this Policy. If you do not consent to the collection and processing of your personal data by the Company in accordance with this Policy, you must immediately stop using the Services and delete the App from your device. We may update this Policy with any personal data.

1.5. We are committed to complying with applicable data protection laws relevant to the jurisdictions where our Users reside in the United Arab Emirates ("UAE"), including the Federal Decree-Law No. 45 of 2021 on the protection of personal data and its executive regulations (collectively, "UAE Data Protection Laws").

1.6. We may update this Policy from time to time to reflect legal, technical, or business developments. The updated version will be posted on the Platform and/or the App, and the date of the policy will become effective upon posting. We encourage you to review this Policy periodically to stay informed about how we are protecting your information.

2. Terms and Definitions

"App" means the proprietary software application known as People OS, which is downloaded, installed, and accessed on mobile devices by Users to access the Company's Services and other related services through digital distribution platforms such as App Store and Google Play.

"Company", "we", "us", or "our" means PeopleOS FZ-LLC, a company incorporated in the Dubai Silicon Oasis Authority (DSOA), with its registered office at Office B, 3305-001-002-003-004-005-006-007-008-009-010-011-012-013-014-015-016, UAE.

"Personal" means any data that can identify a natural person directly or indirectly by the Company, accessible through the App or the Website.

"Registration" means the process a User completes to complete the registration process in the App by providing the required information and/or by completing the registration in the App using a third-party or any individual accessing the Website.

"Services" means web pages and other content located at the domains https://peopleos.io/ and https://app.peopleos.io/, including the Website and the App, and any related services provided by the Company to Users in connection with the Platform, regardless of the devices used to access it.

Any terms not defined in this Policy shall have the meaning ascribed to it under the UAE Federal Decree-Law No. 45 of 2021 on the protection of personal data and its executive regulations ("UAE Data Protection Laws") or other applicable laws, if any, shall be given its ordinary and reasonable meaning.

3. Types of Personal Data and Purposes of its Processing

3.1. We collect your data related to one of the following categories:

- **Information You Provide:** Personal information you provide during registration and use of our Services, such as your name, email address, phone number, profile photo, and other information you choose to share.
- **Information from Your Devices:** With your additional consent, we may access your device's contacts to find other users you connect or you and/or other personnel.
- **Information Collected Automatically:** When you use our Services, we may automatically collect data such as your IP address, or your device type, browser type, pages visited, and usage patterns through cookies and similar technologies.

3.2. The specific categories of personal data collected by the Company which processes in the Services, as well as the purposes for their use, are outlined in the table below:

Data Processing Purposes	Personal Data Processed	Legal Basis
Account Registration and Management	Name, date of birth, city and country of residence, phone number.	Performance of a Contract
Identity Verification	Full name, date of birth, city and country of residence, national identity number, e-mail address, phone number, address, nationality, industry, company / project, website, link to social networks, tax, photo, information on the uploaded documents, other personal data provided as part of the User profile, payment details, other data contained in the messages exchanged by the Users.	Performance of a Contract
Service Personalization and Connectivity	Names and phone numbers stored in your device contacts, device ID.	Consent
To provide access to the "Invite" function of the App and to notify you when your contacts join the App.	Full name, date of birth, city and country of residence, contact details (phone number, e-mail address), nationality, company, industry, role, photo, LinkedIn profile, website, link to social networks, tax, photo, information on the uploaded documents, projects provided, other personal data provided as part of the User profile.	Consent
Thereby Services.		

3.3. The Company will process the personal information outlined in the Section 3.2 above for the purposes specified in accordance with this Policy or applicable laws. We will not collect any personal data from you that we request the deletion of your account at any time by contacting us at dpo@peopleos.io.

Upon the processing of your date of registration request, your account will be deactivated and your personal data will be deleted. We will retain only the Company's aggregated non-personal data and other anonymized data from its databases. This process is typically completed within 30 business days.

Please be aware that the deletion of your account and personal data will result in the permanent loss of any content that you have uploaded or shared with other Users through the normal operation of the Services. We cannot guarantee the deletion of data that has been shared with other Users or that is stored in backup systems or cached that other Users have viewed or stored within their own account history.

Processing of your personal data is necessary for the purpose of processing of certain personal data where necessary for compliance with a legal obligation to which the Company is subject, for the performance of an appropriate contract or agreement with you (including the resolution of disputes).

3.4. To help us improve our Services over time, the Services can access your mobile device's contact list ("**Contacts**"). This access is strictly optional.

By granting the Services access to your Contacts, you represent and warrant that you have the authority to share the contact information of all parties the contact information of which you upload to the Services and the Company permission to process the names and phone numbers in your Contacts for the specified purposes. We will not use this information for any purpose other than to facilitate connections within the Services.

During the registration process, your mobile operating system (e.g., iOS or Android) will prompt you to grant the Services permission to access your Contacts. If you grant permission, the Services collect, store, and will prevent you from using the contact based features of the Services. You can revoke permission to access your Contacts at any time through the privacy settings on your mobile device. Please note that revoking permission may limit your ability to use certain features.

3.5. We may send you marketing communications (e.g., newsletters, communications, e-newsletters, special offers, and event invitations) to inform you about our Services and other events, products, or services. Such communications may be sent to you under applicable law (including, where required, your consent) and will include clear and conspicuous opt-out instructions (e.g., unsubscribe or reply STOP or another point within the Services or expressly agreeing to receive promotional communications from the Company or its partners).

You may withdraw your consent to receive marketing communications at any time by contacting us at dpo@peopleos.io or by using the unsubscribe mechanism in each marketing message.

Withdrawing your consent to marketing communications will not affect the lawfulness of any processing based on your consent before withdrawal. Please note that even if you opt out of receiving marketing communications, you will continue to receive non-promotional messages regarding your account or use of the Services, such as security alerts, billing notices, and important service, security, or operational information.

3.6. We may use your email address to inform you about your use of the Services and warn you if we detect suspicious activity on your account, or to inform you about updates to our Services, or any other transactional or administrative matters. We may also use your email address to inform you about the processing of your personal data for its purposes. This process is typically completed within 30 business days.

You can update your profile data any time using relevant functions of the Services.

You are solely responsible for the information you provide and for keeping your account password secure. We cannot guarantee the security of your data if you share your password or permit others to use your verifying, the accuracy of the personal data you submit.

3.7. Unless specified in this Policy or in applicable laws, we expect you to modify, rectify, or remove any information in your profile to prevent unauthorized access to your account or to prevent access to a present or dated in breach of the Terms of Service, present harm to other Users, or make the Company processes or stores personal data in violation of applicable laws.

3.8. In addition to personal data identifying the User, we use cookies and similar tracking technologies to collect data to improve and enhance your experience, eliminate problems in provision of Services, and generally administer our Services. We may place two cookies on your device:

- **Technical Cookies.** These Cookies are essential for maintaining security, identity verification, and regional compliance of our Services. They help us detect and prevent malicious activity, monitor system performance, and ensure the stability of our platform. These cookies do not improve your user experience.

You can find more information on the Cookies we use in the table below:

Type of Cookie	Purpose	Expiration Period
Analysing User interaction with the Services, analysing the interface performance, analysing technical errors	ID of the User (Anonymous ID or registered User), User's actions and events (page visits, button clicks, registration, object creation), Frequency of actions, Interaction depth, Session length, active time, site time), device used (mobile/desktop), browser, screen, screen resolution, time zone, language, traffic source, geographical zone (city and/or country)	12 months.
Tracking errors and crashes, enhancing App performance (**Technical Cookies**)	Technical error data (error message, call stack, App version, OS version, URL of the page where the error occurred, anonymous identifier, device model)	Session

You provide your consent to the use of Cookies by selecting the appropriate settings on the cookie notice displayed during your first visit to the Website.

You can manage or withdraw your Cookie preferences through your browser settings, thereby restricting the use of all or certain Cookies. Please note that disabling Technical Cookies may limit functionality, is not recommended, and may affect certain Services inaccessible and impair their functionality.

4. Personal Data Disclosure and Transfers

4.1. We do not sell your data and do not allow third parties except for providers that ensure technical support and hosting of the App and Website, and other third parties listed in this section, to access or process other personal data except as described in this section.

4.2. The purposes for which we disclose data the Company processes in the Services are:

- **Legal Obligations.** We may disclose data the Company collects if required by law, court order, or governmental request, or to protect our rights, property, or safety, or that of our Users or the public, including to law enforcement, or in connection with tax or customs inquiries, or in connection with a court or regulatory proceeding.
- **Business Transfers.** In the event of a merger, acquisition, or asset sale, your data may be transferred to the successor entity. We will notify you of any such transfer and any changes to this Policy that are a material consequence of the transfer.
- **Notice.** Where we are not legally prohibited from doing so, we will provide notice before disclosing your data in response to a disclosure request, unless we believe that giving notice would create a risk of harm or obstruction to the related investigation.

5. Personal Data Security

5.1. We take reasonable and appropriate measures to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction in accordance with applicable laws and industry standards. These safeguards include encryption, access controls, and other technical and organizational measures to protect your personal data against unauthorized access and disclosure. However, no electronic transmission or storage is completely secure, and we cannot guarantee absolute security.

5.2. We enforce a strict principle of access limitation. Internal access to personal data is restricted to authorized personnel, executives and contractors and is limited to the specific data necessary to perform their duties. We require all personnel with access to data to adhere to strict confidentiality and data protection obligations and assume responsibilities for protecting data and the consequences of non-compliance. Third-party processors are bound by data processing contracts the termination of their engagement with us.

5.3. We process personal data only for as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. When no longer needed, data is securely deleted or anonymized.

6. Data Subject Rights

All Users and data subjects whose data the Company processes have the following rights:

- **Right to Receive Information.** You can request information on the personal data we collect, the purposes of processing, retention periods, and recipients of data transfers. This information is provided in this policy, upon request, or in your account settings.
- **Right to Data Portability.** You can request a copy of your personal data in a structured, machine-readable format.
- **Right to Rectify.** You can request to correct or update inaccurate or incomplete data.
- **Right to Erasure.** You can request the deletion of your personal data in cases where it is no longer necessary for the purposes for which it was collected, or you withdraw consent (in such cases), there are no legitimate reasons for continued processing, or the personal data is otherwise processed in violation of the applicable regulations.
- **Right to Restrict Processing.** You can request to limit the processing of your personal data in certain circumstances.
- **Right to Withdraw Consent.** If processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of prior processing.

The data subject rights outlined in this Policy are specific to the jurisdictions where our Users reside. Some of these rights and obligations do not preclude or waive any other rights you may have under applicable laws, regulations, or international treaties.

To exercise any of your rights, please contact us at dpo@peopleos.io. We will respond within a certified request to us by contacting us at dpo@peopleos.io. We will respond to your request within a reasonable timeframe, typically within 30 business days, or as required by applicable law. We may request additional information to verify your identity before we process the request. We do not charge a fee for exercising your rights, unless the request is manifestly unfounded or excessive.

7. Contacts

If you have questions, comments or queries you may have regarding this Policy, if you would like to make an inquiry, please or contact us at dpo@peopleos.io.