



PRIVACY POLICY  
UICOM – FZCO

**UICOM – FZCO** (the "Company," "we") greatly values the trust of its clients and visitors to the website <https://uicom.ae>. We are committed to protecting personal information in accordance with high standards of security and privacy. This Privacy Policy ("Policy") has been created to ensure that our users ("you") clearly understand how the Company processes your information, from its collection and use to its disclosure, storage, and protection. Our goal is to ensure transparency in all processes and guarantee the reliable protection of your data.

Your use of the website and the Company's services implies your consent to the collection, use, and storage of your personal data in accordance with this Policy.

By using the Company's services, you also automatically agree to the terms of our Offer. Please also review the Company's Offer and accept its terms if you plan to continue using the website and the Company's services.

**UICOM – FZCO** is an investment company specializing in investments in commercial and technological projects with high growth potential based on conducted research.

The mission of **UICOM – FZCO** is to provide high-quality investment solutions and project management. We strive to combine experience and innovation, providing access to the best investment opportunities at all stages of project development, from classic instruments to venture capital, including PreSeed stages.

**UICOM – FZCO** is registered in accordance with the laws of the United Arab Emirates and is located at Building A1, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates. The Company's website is available at <https://uicom.ae> ("website").

## **1. Data Controller and Processor**

**UICOM – FZCO** acts as the Controller and Processor of your personal data. We are committed to transparency in the processing of your data, and this Policy is intended to ensure that you are fully informed about our data handling practices.

By providing us with your data, you consent to its processing in accordance with this Policy and confirm your agreement to receive informational messages and notifications from the Company.

We process your data in the following instances:

- when visiting the website;
- when filling out application forms on the website;
- when signing up for services through the website or the Company's social media platforms;
- to improve the quality of our services and products;
- to provide customer support and resolve technical issues;
- to conduct marketing research and analyze user behavior;
- to comply with legal and regulatory requirements.

In the event of a violation of the terms of this Policy, access to the website and the Company's services may be temporarily restricted until the completion of an internal investigation.

If you believe that the content of the website contradicts your moral or ethical beliefs, you may cease its use and refrain from visiting it in the future.

## 2. Key principles of personal data processing

You agree that the use of the website and services is subject to the following principles:

- the use of the website and services must align with their intended purpose.
- access to and use of the website must strictly comply with this Policy, the Company's Offer, and applicable laws.
- you must provide accurate and complete information about yourself and any individuals you represent.
- you must refrain from engaging in activities expressly prohibited by this Policy.

The Company processes personal data solely on a lawful and fair basis. We do not transfer or disclose your personal data to third parties without your consent, except as required by applicable law.

Before processing personal data, including its collection, the Company sets clear and lawful objectives. Data processing is limited to achieving these defined goals, ensuring transparency and accountability in protecting user data.

## 3. Terminology

The following key definitions are provided to ensure clarity of terms and help users better understand how their data is collected, processed, and protected within the Company:

- **Personal Data or Personal Information:** any information that allows for the direct or indirect identification of an individual or legal entity, including but not limited to data such as name, surname, date of birth, email address, occupation, gender, and other information that can be linked to a specific person or organization, including legal address and contact details.
- **Processing of Personal Data:** any operation or set of operations performed on personal data, such as collection, recording, organization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction, whether by automated means or otherwise.
- **Controller:** an entity or organization that determines the purposes and means of processing personal data, acting independently or jointly with others.
- **User or Client:** an individual who has reached the age of 18, using the platform, or a minor with the consent of legal representatives, as well as a legal entity.
- **UICOM – FZCO:** a legal entity operating under this name, registered in accordance with the laws of the UAE and represented on the website <https://uicom.ae>.
- **Personal Data Information System:** a system consisting of databases containing personal data and information technologies and technical means used for processing them.

- **Agreement:** an arrangement between the Company and the client for the provision of services, concluded in written or electronic form.
- **Cross-Border Transfer of Personal Data:** the process of transferring data to government bodies, individuals, or legal entities located outside the country where the data was originally collected.

#### 4. What data we may collect

The Company strives to avoid collecting unnecessary personal data and only gathers the information necessary for processing and storage to provide high-quality services. Relationships with Users are governed by the terms of the Offer and other documents available on the website.

YOU ACKNOWLEDGE THAT YOU ARE FULLY RESPONSIBLE FOR PROVIDING CONSENT TO UICOM – FZCO FOR THE USE OF YOUR PERSONAL DATA TO ENABLE THE EFFECTIVE DELIVERY OF SERVICES THROUGH THE WEBSITE AND FOR FULFILLING ALL SERVICE OBLIGATIONS.

UNLESS OTHERWISE STATED, UICOM – FZCO ASSUMES THAT CONSENT WAS REQUESTED AND GRANTED UPON VISITING THE WEBSITE OR THROUGH OTHER CONTACT METHODS LISTED ON THE WEBSITE <https://uicom.ae>.

When using the Company's products and services, you may provide us with additional information about yourself. We may also collect information related to your use of the website and combine it with information from other users, which helps improve the quality of the Company's services for you.

The data we may collect about you as a user of the website, products, or services of the Company includes:

- **Personal Information:** Your first and last name, middle name; username and password; mailing address; postal code; email address; phone number; IP address used to connect your computer to the Internet; information about your computer and connection such as browser type, version, and timezone setting, types and versions of browser plug-ins, operating system and platform; language; internal user ID; date of birth; passport number or other identification document; personal ID in social networks; browsing history; tracking functionality such as "Send data via SMS"; tracking functionality such as "Map a route"; data about the start and duration of user sessions on the site; browsing data during the user's session; biometric personal data (e.g., user photos).
- **Additional Information:** Some data we receive may not be clearly identifiable. We may also collect information such as demographic data, information about your use of the website, and general data related to the site (non-identifying information). We may collect information from registered and unregistered users of the site.
- **Data from mobile devices,** such as location. We may use such information obtained through third-party services, although you can hide it from us. If you do not know how to disable your device's location services, we recommend contacting your mobile service provider or device manufacturer.
- **Information about you from third parties** that they may provide to us. If we combine this information with information collected about you through the website, we will continue to treat the combined information as described in this Policy.
- **Information about a legal entity:** name, address, website, and contact details of its representative.

When you use the Company's services, you agree to the collection of your personal information, as well as to receiving emails, including the use of your information for promotional mailings aimed at promoting the Company's products or products similar to ours. You can withdraw your consent at any time by unsubscribing from our emails using the opt-out link contained in each email from us.

## **5. User Requirements**

To access and use the website, as well as to independently utilize the Company's products and services, you must be 18 years of age or older, or you must have reached the age of majority according to the laws of your country of citizenship or the country of residence where you are using the Company's services. If you are under 18 years of age, you may only use our services with the consent of your legal representative.

If, despite reaching the age of 18, you are still considered a minor according to the laws of your country, you are required to obtain consent from your legal representative to use the website and the Company's services. Your legal representative must review the terms of this Policy and consent to their acceptance on your behalf.

If you are an individual representing a legal entity, you must be duly authorized by the legal entity you represent to perform actions on the website.

The Company reserves the right to investigate attempts to use the website by individuals who are not authorized by those legal entities and to block access to the website and the Company's services for such individuals.

The Company is not responsible for the actions of third parties aimed at fraud or identity theft of users. Any attempt to gain unauthorized access to or use the website through fraudulent or illegal means is the full responsibility of those who carry out such actions.

## **6. Processing of Personal Data**

The Company processes your personal data in strict accordance with UAE legislation, international data protection standards, as well as the provisions of this Policy and the Company's Offer. Data processing is carried out solely for the following purposes:

- identification of website users;
- sending security notifications and action confirmations;
- communicating with users in their preferred language;
- personalizing website content to improve user experience;
- registering and managing user accounts;
- processing requests and providing responses from the Company;
- organizing marketing and promotional activities;
- conducting surveys and polls to enhance service quality;
- collecting and analyzing statistical data for internal research;
- improving the quality of services provided;
- developing and enhancing products and services;
- complying with legal obligations and combating fraud;
- fulfilling contractual obligations to clients;
- ensuring access to website functionalities;
- protecting information security and user data.

These measures ensure that your personal data will only be used for necessary purposes, with all security and confidentiality standards strictly followed.

Your consent also allows us to share your data with third parties in the following cases:

- in response to lawful requests from government authorities and law enforcement agencies;
- to protect our legal rights, including in legal and other official proceedings;
- when disclosure of information is necessary to prevent physical harm, financial loss, or to combat illegal activities and fraud.

Please note that the purposes listed above for processing data are not exhaustive. All purposes for which we process your information will be recorded and made available in the updated version of this Policy.

We actively use the collected information to ensure and improve the quality of the services provided, process your requests, prevent fraud, and provide relevant information and advertisements that may be of interest to you, while complying with applicable laws and regulatory requirements.

## **7. Cross-Border transfer of personal information**

The Company strictly adheres to UAE Data Protection Law, ensuring a high level of protection for your personal data within the UAE. We implement all necessary security measures to comply with the highest international standards of personal information protection, in line with UAE law and other applicable international regulations.

As an organization operating under UAE law, we store your information on servers located within the UAE. In the course of our international operations, we may transfer and provide access to personal data in countries that offer a level of data protection comparable to that in your country, or another level of protection as required for the purposes described earlier. This Policy remains in effect and applicable even when transferring data across borders to other countries.

We ensure that all international data transfers are accompanied by necessary security measures in compliance with UAE Data Protection Law and other relevant laws. If you need further information about the safeguards provided, please contact us using the details provided below.

When transferring personal data to external suppliers or third parties outside the UAE, we adhere to standardized procedures, including compliance with UAE data protection regulations

and the relevant laws of the countries where our partners' servers are located. This ensures the reliable protection of your information, regardless of its location. During the cross-border transfer of data, we apply strict protective measures in accordance with this Policy.

For individuals subject to UAE Data Protection Law, when transferring data to countries or territories outside the UAE that are not recognized as providing an adequate level of protection, we use the necessary data transfer mechanisms to ensure their security. We strictly adhere to these measures to guarantee that any transferred information will be securely protected according to our high security standards.

## 8. Updating Personal Data and Responsibility for Its Accuracy

If your personal data, which you have provided to us, changes—such as a change in your email address—or if you wish to withdraw a previously made request, please notify us by contacting our website support service.

We are not responsible for any losses arising from your provision of inaccurate, false, incomplete, or outdated personal information.

## 9. User Rights Regarding Personal Information

You have certain rights concerning the personal information we hold about you. These rights include:

- **Right to information and access:** you have the right to know whether your data is being processed and to access the information we hold about you. It is important to note that in some situations, we may deny access to data if legally required or if the information is legally protected.
- **Right to rectification:** you have the right to request an update or correction of inaccurate or incomplete information related to you.
- **Right to erasure:** in certain circumstances, you may request the deletion of your information. However, we may refuse to delete it if there are legal grounds for its retention.
- **Right to restrict processing:** you may request a restriction on the processing of your information in specific cases, although we may continue processing if there are legal reasons to do so.
- **Right to withdraw consent:** you can withdraw your consent to data processing. This will not affect the lawfulness of processing conducted before the withdrawal of consent.

To exercise these rights, please contact us via the email provided in this Policy.

## 10. Collaboration with Suppliers and Advertising Partners

We collaborate with various advertising agencies and technology providers who assist us in tracking and analyzing user behavior on the website. These external partners may use technologies to display advertisements that may interest you. You have the option to opt out of such advertising; however, please note that we do not control the content of external advertising materials and cannot guarantee their absence on the website.

## 11. Use of Automation and Profiling

We actively utilize automated solutions, including profiling technologies, to enhance your experience with the Company's services and increase your satisfaction. These systems help us tailor website content and offers according to your personal preferences based on your behavior, browsing history, and viewed advertisements.

## 12. Use of Cookies and Similar Technologies

We use cookies and other similar tracking technologies to enable essential functions of the Company's website. Cookies are small text files that the website uses to recognize repeat visits, facilitating

continuous access and making the site easier to use. These files also allow us to track user sessions and analyze how visitors use the website, which helps us improve the quality of our services. Detailed information about our use of cookies is available in our Cookie Policy on the website.

### 13. Transfer of Personal Data

We handle your personal data with great care and commit not to disclose it to third parties except when necessary to provide the Company's services or to conduct our business operations with you, according to the specified purposes. We may disclose your information in the following cases:

- when required by law;
- in the context of legal proceedings or anticipated legal proceedings;
- to protect our legal rights, including fraud prevention or credit risk reduction;
- to the company whose information has been requested by the user;
- to third parties in the case of a merger, restructuring, joint venture, assignment of rights, or the sale of the business, in whole or in part.

We may also share your data with trusted partners to contact you upon your request, assist in statistical analysis, or provide customer support. These third parties are obligated to use your information solely for the stated purposes and to maintain its confidentiality. If you prefer that we do not share your data with such organizations, please contact us.

Additionally, we may transfer data to companies represented by their agents on our website when users request information via SMS. The transferred data includes the name, surname, phone number, email, and time of request.

We collaborate with other companies and individual contractors to provide services to our users. This may include data analysis and the provision of additional services. In all cases, we require our partners to adhere to this Policy when handling your information.

### 14. Personal Data Protection

We take all necessary measures to ensure the security of your personal data. For this purpose, we have developed a comprehensive data protection system that includes legal, organizational, and technical measures:

- **Legal protection:** Involves a set of regulations and procedures aimed at creating, maintaining, and developing a data protection system;
- **Organizational protection:** Regulates data security management, including access control and interaction with partners and external organizations;
- **Technical protection:** Consists of a range of technologies and software that provide reliable protection of personal data.

Key data protection measures include:

1. Appointment of a data processing officer;
2. Assessment of data security risks and implementation of protection measures;
3. Development of a data processing policy;



4. Use of unique access passwords for employees in accordance with their roles;
5. Implementation of verified information protection tools;
6. Regular updates of antivirus software;
7. Ensuring data protection against unauthorized access;
8. Prompt response to security incidents;
9. Conducting internal audits and checks.

Additionally, your account information is password-protected and stored in a secure database with restricted access. We also recommend that you take measures to protect your data, including using strong passwords and securing your devices.

## **15. Data retention periods**

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected. The key criteria that determine the data retention period include:

- legal requirements for data retention.
- the existence of legitimate grounds for retaining the data.
- discontinuation of data usage upon your request if you cease to be our client or your legal representative.
- you may request the deletion of your data at any time by contacting us through the details provided in this Policy.

Even after your account is closed, we may retain certain data for the time necessary to comply with legal obligations, resolve disputes, and fulfill contractual obligations. This data will be deleted as soon as it becomes irrelevant or five years after the last interaction with our services, whichever occurs first.

## **16. Your data protection rights**

We respect your privacy rights and provide you with the ability to control the processing of your personal data. You may, at any time:

- withdraw your consent to data processing, request data deletion or correction by sending an email to the provided contact address;
- restrict the processing of your data if you believe it is being processed unlawfully or is no longer relevant;
- object to the processing of your data by sending a notice to the provided contact address;
- request access to your data or request corrections; refusal is possible only in cases provided by law, with an explanation of the reasons for the refusal;
- obtain all your data in a digital format for further use or transfer.

If you need to know what data we hold or how it is being used, we are ready to provide this information upon request.

## **17. Communication Methods**

We reserve the right to contact you through various channels provided by you during registration or use of the Company's services, including:

- emails and push notifications to inform you about bookings or upcoming events;
- phone calls to notify you of additional services;
- emails with information about transactions, promotions, or administrative notices.

We may also use push notifications through the website to provide important alerts or relevant information.

All notifications from the Company will be sent to the email addresses or other contact details provided by you, according to your preferences. If you wish to change notification settings or opt out of certain types of notifications, you can do so in your account settings or by contacting us.

## **18. External Links and Resources**

The website may contain links to external sites. We do not control these sites and are not responsible for their content, security measures, or data processing practices. The presence of links does not imply that we endorse or approve of these sites, their content, or their owners. This Policy does not apply to external sites, and we recommend that you review their own privacy policies.

## **19. Policy Updates**

We continually improve our services to provide you with the best possible experience. As a result, this Policy may be updated periodically to comply with current international and UAE legal requirements. We recommend that you regularly check this page to stay informed of any updates. In the event of significant changes, we will notify you by posting the new version of the Policy on the website and sending a notice to your email. By continuing to use the website and the Company's services after such notifications, you agree to the terms of the updated Policy.

### **Data Protection Officer:**

- name: Omar Salibeira
- email: salibeira.o@uicom.ae

If you have any questions or complaints regarding this Policy or the processing of your data, please contact us:

- through the website: <https://uicom.ae>
- by email: [company@uicom.ae](mailto:company@uicom.ae)