Data Protection Statement of DataConsulting

Version effective as of October 2026

This Privacy Policy explains how IGR FZ-LLC, trading as DataConsulting ("DataConsulting", "we", "us" or "our"), collects, uses, shares and protects personal data when you visit https://www.data-consulting.ae (the "Website"), contact us, attend our training, receive our communications, or deal with us as a client, prospective client, supplier or business contact.

If you provide us with personal data of other persons (such as family members, work colleagues), please make sure the respective persons are aware of this Privacy Policy and only provide us with their data if you are allowed to do so and such personal data is correct.

We are established in the United Arab Emirates outside the Dubai International Financial Centre and the Abu Dhabi Global Market. Our processing is therefore governed by Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (the "PDPL"), together with any implementing regulations, decisions and guidance issued under it and other applicable UAE laws.

Where our processing of your personal data is subject to the EU General Data Protection Regulation 2016/679 (the "GDPR"), the United Kingdom GDPR or the Swiss Federal Act on Data Protection (the "FADP"), for example because we offer services to you or monitor your behaviour while you are in the European Economic Area, the United Kingdom or Switzerland, we apply the additional protections those laws give you. This Policy identifies where those protections differ.

Where the laws above set different requirements for the same processing, we aim to follow the requirement that gives you greater protection, unless the law requires otherwise.

1. Controller / Data Protection Officer

For the processing described in this Policy, the controller of your personal data (i.e. the responsible person) - unless we have informed you differently in certain cases - is:

Company: IGR FZ-LLC, trading as DataConsulting

Legal form: Free zone limited liability company licensed in the Emirate of Ras Al Khaimah, United Arab Emirates

Licensing authority and licence number: License: 47019395

Email: office@dataconsulting.ae

We have appointed a Data Protection Officer for data protection matters. You can reach them at office@dataconsulting.ae.

2. Collection and Processing of Personal Data

From you: You provide us with much of the data we process: When you request a consultation or contact us, we collect your name, job title, organisation, email address, telephone number, the content of your message and any information you choose to share about your organisation's data protection needs.

When your organisation engages us, we collect the names, job titles and business contact details of your representatives, signatories and project contacts, together with billing details such as company name, trade licence details, tax registration number and invoicing address.

When you attend our training, we collect your name, organisation, job title, attendance records and where we provide them, assessment results and certificates of completion.

If you request or download resources from the Website and we ask for your details first, we collect your name, business email address and organisation.

If you supply services to us, we collect your business contact details, contract and payment information and information needed for due diligence.

Please do not send us sensitive personal data, or confidential personal data about other people, through the Website, by email or through messaging apps before an engagement is in place. If such data is needed for an engagement, we will agree a secure method of transfer with you.

When you visit the Website, our hosting provider and the Website software automatically record technical data such as your IP address, browser type and version, device type, operating system, date and time of access, pages requested and referring website. This data is used to deliver the Website, keep it secure and diagnose faults.

From third parties: We may receive personal data about you from:

- your colleagues, where they name you as a contact for a project or invoice;
- professional networking platforms and public sources such as company websites and public registers, where you have made your business details publicly available; and
- partners and other professionals who refer you to us.

We only use personal data from these sources for the purposes described in Section 3 and only where a legal basis applies.

When we review records of processing, carry out data protection checks, run audits or technical assessments, or support a client in implementing processes, we may have access to personal data held by that client. In doing so, we act as a processor on behalf of the client and the client remains the controller. If you contact us about personal data that we hold on behalf of a client, we will refer your request to that client and assist the client in responding.

3. Purpose of Data Processing and Legal Grounds

We use your personal data to:

- respond to your enquiries and arrange consultations;
- prepare proposals and engagement letters, and enter into contracts with your organisation;
- deliver our services, manage projects and communicate with your organisation;
- deliver training and issue certificates of completion;
- invoice, collect payment and keep financial records;
- carry out conflict, sanctions and supplier due diligence checks;
- operate, secure and improve the Website;
- send business updates and invitations where Section 3 allows;
- comply with legal, tax and regulatory obligations and respond to lawful requests from public authorities; and
- establish, exercise or defend legal claims.

Under the PDPL, we process your personal data on the basis of your consent or, where consent is not required, on one of the grounds the PDPL recognises. These include processing necessary to enter into or perform a contract with you, to comply with obligations imposed on us by UAE law and to establish, exercise or defend legal claims.

The PDPL does not contain a general "legitimate interests" ground. Where the GDPR, the UK GDPR or the FADP applies, we may also rely on our legitimate interests, or those of a third party, where those interests are not overridden by your interests and rights. Our legitimate interests include running and securing our business, managing client relationships, keeping in touch with business contacts and improving our services.

We send business updates, articles and event invitations by email only where you have agreed to receive them or, where the law permits, where you are an existing client contact and the content relates to services similar to those your organisation has used.

You can stop marketing messages at any time by using the unsubscribe link in any email or by writing to office@dataconsulting.ae. Opting out does not affect service communications about an ongoing engagement.

You may withdraw consent at any time by contacting us or by using the mechanism we provided when you gave it. Withdrawal does not affect the lawfulness of processing carried out before you withdrew it.

4. Disclosure and Transfer of Data Abroad

We share personal data only where necessary for the purposes in Section 3, with:

- service providers who support our business, such as website hosting, email and productivity software, cloud storage, video conferencing, accounting and payment providers, who process personal data on our instructions;
- consultants and specialist subcontractors who work with us on client engagements and are bound by confidentiality obligations;
- professional advisers, such as lawyers, auditors, accountants and insurers;
- banks and payment providers, to process payments;
- courts, regulators, law enforcement and other public authorities, where the law requires it or where necessary to protect our rights; and
- a purchaser or successor of our business, if we sell, transfer or restructure all or part of our business, subject to equivalent confidentiality and protection.

We require our service providers and subcontractors to protect personal data, to use it only for the services they provide to us and to delete or return it when those services end.

Some of our service providers and team members are located, or store data, outside the United Arab Emirates. We transfer personal data outside the UAE only where the PDPL permits it, for example to a country recognised as offering an adequate level of protection, or where another lawful ground applies, such as a contract with appropriate data protection terms, your consent, or where the transfer is necessary to perform a contract with you.

Where the GDPR, the UK GDPR or the FADP applies to your personal data, we transfer it to countries without an adequacy decision only under appropriate safeguards, such as the standard contractual clauses approved for that purpose, or where a legal exception applies.

You may contact us for information about the safeguards we use for a particular transfer.

5. Retention Periods for your Personal Data

We process and retain your personal data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations.

Personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so.

As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data (e.g., system logs)

6. Cookies / Tracking and Other Techniques Regarding the Use of our Website

We typically use "cookies" and similar techniques on our websites and apps, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our website or install our app. If you revisit our website [or use our app], we may recognize you, even if we do not know your identity. We use cookies that are strictly necessary to deliver the Website, keep it secure and remember your cookie choices. These do not require your consent.

If we use analytics, functionality or marketing cookies, or embed content from third parties that sets its own cookies, we will do so only after you give consent through our cookie banner, where consent is required. You can withdraw or change your consent at any time through the cookie settings link on the Website.

The Website may contain links to third-party websites, platforms and resources, including professional networking and messaging services. We are not responsible for the privacy practices of those third parties. Please read their privacy policies before providing personal data to them.

In addition, maintain pages and other online presences on social networks and other platforms operated by third parties (such as Facebook, Twitter, Youtube, Pinterest or Instagram) In this context, we may process data about you. We may receive data from you (e.g., when you communicate with us or comment on our content) and from the platforms (e.g., statistics).

If you contact us through a messaging app (such as Whatsapp), the provider of that app processes your data under its own terms and privacy policy.

7. Obligation to Provide Personal Data To Us

In the context of our business relationship you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (as a rule, there is no statutory requirement to provide us with data). Without this information, we will usually not be able to enter into or carry out a contract with you (or the entity or person you represent). In addition, the website cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

8. Profiling and Automated Individual Decision-Making

We do not make decisions about you based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you.

We may use software tools, including tools that incorporate artificial intelligence, to support tasks such as drafting, summarising and organising our work. We do not enter client personal data or confidential client information into such tools unless the tool has been approved by us, appropriate contractual and security terms are in place, and the client has not instructed otherwise. All advice and deliverables are reviewed by our consultants.

9. Your Rights

Subject to the conditions and exceptions in the PDPL, you have the right to:

- obtain information about the personal data we hold about you and how we process it, and receive a copy;
- receive your personal data in a structured and machine-readable format and have it transferred to another controller where technically feasible;
- have inaccurate personal data corrected and incomplete data completed;
- have your personal data erased where it is no longer needed or is processed unlawfully;
- restrict processing in the circumstances the law provides;
- object to processing, including for direct marketing;
- object to decisions based solely on automated processing that produce legal effects or seriously affect you; and
- withdraw your consent at any time.

Additional rights under the GDPR, UK GDPR and FADP. Where those laws apply, you also have the rights they give you, including the right to object to processing based on legitimate interests and the right to lodge a complaint with the competent supervisory authority.

Some rights are not absolute. We may refuse or limit a request where the law permits, for example where the request is manifestly unfounded or excessive, where disclosure would reveal personal data about another person, or where we must keep data to comply with the law or defend legal claims. If we refuse a request, we will tell you why.

How you can exercise your rights:

Making a request. Send your request to office@dataconsulting.ae with the subject line "Data Protection Request" and describe the right you wish to exercise.

Verification. We may ask for information to confirm your identity, or your authority if you act for someone else. We use that information only to verify the request.

Timing. We will respond within one month of receiving a verified request. Where a request is complex or we receive many requests, we may extend this period where the applicable law allows, and we will tell you within the first month.

10. Complaints

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent UAE Data Office. Where the GDPR applies, you may complain to the supervisory authority in the EU member state where you live, work or where the alleged infringement occurred. Where the UK GDPR applies, you may complain to the Information Commissioner's Office. Where the FADP applies, you may contact the Swiss Federal Data Protection and Information Commissioner.

11. Amendments of this Data Protection Statement

We may update this Policy to reflect changes in our services, our practices or the law. We will post the updated version on the Website with a new Effective Date and where the changes are significant, we will take reasonable steps to tell you, for example by email.

This Policy is written in English. If we provide a translation and there is any conflict, the English version prevails to the extent permitted by law.