

Investera Privacy Policy

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Investera Solutions Business Applications – Sole Proprietorship L.L.C., a company incorporated in accordance with the laws of the United Arab Emirates with commercial number CN - 2865994, and having its address at Level 20, Tower C2, Al Bateen, Abu Dhabi, United Arab Emirates (“**Investera**”). The software (“**Software**”) is owned by Investera. It offers next generation investment management platform. When you use these services, you will be sharing some information with us. For you to be aware about your privacy, this privacy policy (“**Privacy Policy**”) sets out the information we collect, how we use it, whom we share it with, and the controls we grant you to access, update, and delete your information. Make sure to read the entire policy to fully understand all the below terms related to your privacy.

Please note that we take part of the European General Data Protection Regulation of April 27, 2016 (Regulation (EU) 2016/679) (GDPR) which is available on <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>.

BY DOWNLOADING AND USING THE SOFTWARE, YOU FULLY CONSENT TO THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY, INCLUDING THE DISCLOSURE OF YOUR INFORMATION TO LOCATIONS WHICH THE AUTHORITIES IN YOUR JURISDICTION MAY NOT RECOGNISE AS PROVIDING AN ADEQUATE LEVEL OF PROTECTION FOR PERSONAL DATA.

What Do We Collect

There are three basic categories of information we collect:

1. Information you share with us

When you use the Software, we collect the information that you choose to share with us. For example, our Software requires you to download the Software, create an account, and log in with a password. To make it easier for others to find you, we may also ask you to provide us with some additional information that will be publicly visible on the Software. All information you send through the Software is information saved with us as well. When you contact our customer support team, in any way, we will collect whatever information you share. Please note that we do not store credit/debit card numbers, nor do we share customer details in any way with any third parties.

2. Information from use of the Software

Information about your use of the Software services such as:

- **Usage Information:** information about your activity through the Software.
- **Content Information:** content you create on the Software and information about the content you create or provide.
- **Device Information:** information from and about the devices on which you use the Software.
- **Device Phonebook.**
- **Camera and Photos:** images and other information from your device’s camera and photos.

- **Location Information:** information about your location. With your permission, we may also collect information about your precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses.
- **Information Collected by Cookies and Other Technologies:** Some information about your activity, browser, and device, may be collected by cookies and other technologies such as web beacons, web storage, and unique advertising identifiers. We may also use these technologies to collect information when you interact with the Software we offer through one of our partners. Most web browsers are set to accept cookies by default. If you prefer, you can usually remove or reject browser cookies through the settings on your browser or device. Keep in mind, though, that removing or rejecting cookies could affect the availability and functionality of our services on the Software.
- **Log Information.** We also collect log information when you use the Software. This information includes, among other things: error debugging information, user login/logout, usage duration, pronunciation audio, text and scoring results.

3. Information we Collect from third parties

We may collect information that other users of the Software, provide about you when they are using our Software.

Use of Information

We use the information to provide you with a better version of the Software that we continuously work on improving. Below are elaborated techniques we adopt in this course:

- develop, operate, improve, deliver, maintain, and protect the Software;
- monitor and analyze trends and usage;
- contextualize your experience and applying other labels based on the content;
- provide and improve ad targeting and measurement, including the use of your precise location information (where you grant us permission to collect that information), both on and off our Software;
- enhance the safety and security of the Software;
- verify your identity and prevent fraud or other unauthorized or illegal activity;
- use information we collected from cookies and other technology to enhance the Software and your experience throughout the use of the Software;
- enforce our EULA and other usage policies.

How We Share Information

We may share information about you in the following ways:

- With other users of the Software, we may share the following:
 - i. information about you, such as your username and name;

- ii. information about how you have interacted with our services;
 - iii. any additional information you have directed us to share;
 - iv. content you post or send. Please note that how widely your content is shared depends on your personal settings and the type of service you are using.
- With all users, our business partners, and the general public, we may share the following:
 - i. public information such as your name, username and profile picture.
 - ii. any content that you submit to an inherently public service. This content may be viewed and shared by the public at large both on and off the Software, including through search results, on websites, in applications, and in online and offline broadcasts.
 - With our affiliates.
 - With third parties, we may share your information with:
 - i. service providers who perform services on our behalf.
 - ii. business partners that provide services and functionality.
 - iii. third parties for legal reasons. We may share information about you if we believe that disclosing the information is needed to:
 - a. comply with any valid legal process, governmental request, or applicable law, rule, or regulation.
 - b. investigate, remedy, or enforce potential EULA violations.
 - c. protect the rights, property, and safety of us, our users, or others.
 - d. detect and resolve any fraud or security concerns.
 - iv. third parties as part of a merger or acquisition: If Investera gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of our business to another company, we may share your information with that company before and after the transaction closes.

We may also share with third parties, such as advertisers, aggregated, non-personally identifiable, or de-identified information.

Third-Party Content and Integrations

The Software may also contain third-party links and search results, third-party integrations, or offer a co-branded or third-party-branded service. You may be providing information (including personal information) directly to these said third parties, us, or both. You acknowledge and agree that we are not responsible for how those third parties collect or use your information.

Analytics and Advertising Services

1. Information you share with us

We may permit other companies use cookies, web beacons, and similar technologies on the Software. These companies may collect information about how you use the Software over time and combine it with similar information from other services and companies. This information may be used to, including but

not limited to, analyze and track data, determine the popularity of certain content, and better understand your online activity. Additionally, some companies, including our affiliates, may use information collected on the Software to measure the performance of advertisements and deliver more relevant advertisements on behalf of us or other companies, including on third-party websites and applications.

2. Information provided by us

We may collect information about your activity on third-party services that use cookies and other technologies provided by us. We use this information to improve our advertising services, including measuring the performance of advertisements and showing you more relevant advertisements.

How Long We Keep Your Information

We store the following information for as long as they are required for users' log in:

- your basic account information, including your name, phone number, and email address.
- location information for different lengths of time based on how precise it is and which services you use.
- Keep in mind that, while our systems are designed to carry out our deletion practices upon deletion of accounts, we cannot promise that deletion will occur within a specific timeframe. There may be legal requirements to store your data and we may need to suspend those deletion practices if we receive valid legal process asking us to preserve content or if we receive reports of abuse or other Terms of Service violations. Finally, we may also retain certain information in backup for a limited period of time or as required by law.

Control over Your Information

We want you to be in control of your information, so we provide you with the following tools:

- Download data: you can access and edit most of your basic account information right on the Software. Because your privacy is important to us, we may ask you to verify your identity or provide additional information before we grant you access or update your personal information. We may also reject your request to access or update your personal information for several reasons, including, the request risks the privacy of other users or if the request is unlawful.
- Revoking permissions: if you grant us authorization to use your information, you can always change your mind and simply revoke your permission by changing the settings on your device if your device offers this option. By doing that, services on the Software will lose full functionality.
- Deletion of the Software.

Users in the European Union

If you are a user of the Software in the European Union, you should know that Investera is the controller of your personal information. Here is some additional information we would like to bring to your attention:

1. Basis for using your information

We can only use your personal information when certain conditions apply:

- **Contract:** one reason we might use your information is because you have entered into an agreement with us. When you purchase our Software and accepted our EULA, we need to use some of your information to collect payment and make sure your information is valid.
- **Legitimate interest:** another reason we might use your information is because we have, or a third party has, a legitimate interest in doing so. We also use some information about show interesting advertisements. An important point to understand about legitimate interest is that our interests do not outweigh your right to privacy, so we only rely on legitimate interest when we think the way we are using your data does not significantly impact your privacy or would be expected by you, or there is a compelling reason to do so.
- **Consent:** in some cases, we will ask for consent to use your information for specific purposes. If we do, we will make sure you can revoke your consent on the Software or through your device permissions. Even if we are not relying on consent to use your information, we may ask you for permission to access data like contacts and location.
- **Legal obligation:** we may be required to use your personal information for legal compliance.

2. Your right to object

You have the right to object to our use of your information. With many types of data, we provide you with the ability to simply delete it if you do not want us processing it anymore. For other types of data, we grant you the ability to stop the use of your data by disabling the feature altogether.

3. International transfers

We may collect your personal information from, transfer it to, and store and process it in the United States and other countries outside of where you live. Whenever we share information of EU users outside the EU we make sure an adequate transfer mechanism is in place.

Complaints? If you are based in the EU, you can always file a complaint with the supervisory authority in your Member State.

Children

The Software is not intended for anyone under the age of eighteen years old, and that is why we do not knowingly collect personal information from anyone under the age of eighteen years old.

Revisions to the Privacy Policy

We may change this Privacy Policy from time to time and such change will be published in the Software and it will be your responsibility to review the changes published in the Software. Investera bears no liability in relation to any change it introduces to this Privacy Policy.