

# Privacy Policy

Last updated: December 17th, 2025

## I. Definitions

**Data Controller:** A natural or legal person which determines the purposes and means of the processing of personal data.

**Data Processor:** A natural or legal person which processes personal data on behalf of the controller and its instructions.

**Data Protection Officer (DPO):** The Data Protection Officer is a designated individual within Degensoft responsible for overseeing data protection strategy and compliance with applicable privacy regulations.

**Offerings:** the product and services offered through the Websites in scope, as defined in [degensoft.ae](https://degensoft.ae/terms-of-use) Terms of Use.

**Personal Data:** Any information relating to an identified or identifiable natural person.

**Processing:** Any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction. Processing also includes transferring Personal Data to third parties.

**User/You:** an individual over 18 years old who can be identified, directly or indirectly, in particular by reference to – an identifier such as a name, an identification number, location information, or an online identifier, or any relevant factors of the individual;

**Website:** [degensoft.ae](https://degensoft.ae), along with its related sub-domains; and Degensoft's Trust Center website, as applicable, and as referred to in [degensoft.ae](https://degensoft.ae/terms-of-use) Terms of Use.

## II. Purpose

Degensoft Ltd. (“**Degensoft**,” “**we**,” “**us**,” or “**our**”) understands that your personal information is important. We are committed to processing your Personal Data responsibly and in accordance with applicable laws and regulations. We appreciate the trust you place in us when you visit or use our website and services.

This Privacy Policy (“**Privacy Policy**” or “**Policy**”) applies to our Websites and Offerings.

This Privacy Policy describes how we collect and process Personal Data when you access or use the Offerings. When you leave the Offerings or the Website, this Privacy Policy no longer applies. Any

third-party website, application, or service you access afterward is governed by its own terms and privacy policy.

We design our Offerings to minimize the collection of personal data wherever possible. Where processing is necessary, we apply appropriate technical and organizational safeguards to ensure your information is handled securely.

This Privacy Policy also explains your rights and choices regarding your Personal Data, including how you may contact us with questions or concerns.

Please read this Privacy Policy carefully. If you do not agree with this Policy or any part of it, you should not access or use any portion of the Offerings. If you later change your mind, you must stop using the Offerings. You may exercise your rights regarding your personal data as described in this Policy, and you may contact us at any time using the details provided in Section XIV of this Policy (Contact us).

This Privacy Policy forms an integral part of the Degensoft.ae Terms of Use. All capitalized terms used in this Policy have the meanings assigned to them in the Terms of Use unless expressly stated otherwise.

This Policy does not apply to data collected outside the Offerings, including through third-party offerings. For those, please consult the relevant privacy notices.

### **III. Personal Data Collected**

When you use the Offerings, the categories of data that we collect are the following:

#### **Data you voluntarily provide to us when using the Offerings:**

- Any identification and contact data such as your email address, your name, and any other Personal Data you provide to us when communicating with us (in limited circumstances, e.g. when reaching out to our support service, applying to become a contributor, subscribing to the newsletter to receive information about the Offerings);
- Any data related to your use of the Offerings;

#### **Data automatically collected when you use the Offerings:**

We may automatically collect certain data, either directly or through third-party service providers, when you visit the Website and use the Offerings. Such data does not reveal your specific identity (such as your name or contact information), but may include the following:

- Data collected by log files, including internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks;

- Analytics and data related to your use of the Offerings (e.g., IP address, MAC address, log files, domain server, data related to usage, performance, website security, traffic patterns, and location information);
- Behavioral data related to your use of the Offerings(including, in particular, and depending on the case, data related to how you interact with our Offerings, content viewed, features accessed, your status on our Offerings, such as Website/Offerings launches, taps, clicks, scrolling data, etc.).

### **Third-Party Offerings**

We may integrate services and technologies from third parties into some functionality of the Offerings. We may engage third-party service providers to facilitate the delivery of our communications.

For more information on how the third parties may independently collect and process information, we recommend reviewing their privacy policies and associated terms. Please note that we are not responsible for the data protection practices of any third party. We also use cookies and similar tracking technologies to automatically collect data from and store information on your device when you use, access, or otherwise interact with our Offerings.

Should you wish to opt out of automatic data collection, you have the option to disable cookies. For more information on cookies and other tracking technologies, as well as instructions on how to disable them, please refer to Section X of this Policy (Cookies and Other Tracking Technologies).

## **IV. Legal Grounds for Collecting Data**

We are required to warn you about the legal basis on which we treat your Personal Data. We shall treat your Personal Data legitimately, fairly, and transparently. We only gather and process information about you when we have a legal basis to do so. These legal grounds depend on your use of the Website and the Offerings, meaning we collect and use your information only when:

1. **Performance of an agreement.** It is required for the performance of an agreement to which you are a party or to take steps at your request prior to entering into such an agreement.
2. **Legitimate interest.** It serves a legitimate interest (that is not outweighed by your data protection interests), such as research and development, marketing and promotion of our activities, and protection of our legal rights and interests.
3. **Consent.** You give us permission to collect and use your Personal Data for a specific reason.
4. **Legal obligation.** The Company needs to process your Personal Data to comply with a legal obligation.

## **V. Purpose of Collecting Personal Data**

Degensoft uses and collects your Personal Data for the following purposes:

1. **User Assistance.** Degensoft uses and collects your Personal Data in order to communicate with you to provide customer service;
2. **Offerings Development.** In order to optimize your user experience, we may use your Personal Data to operate, maintain, and improve our Offerings;
5. **Encouraging Legitimate Interests.** Generally, We process Personal Data for the purposes of our legitimate interest, for example, for legal compliance purposes, regulatory, or other corporate governance requirements, security purposes, submitting reports as required by applicable laws or regulations, to comply with our legal obligations, and resolve any disputes that we may have, or to maintain the ongoing confidentiality, integrity, availability, and resilience of the Platform;
6. **Marketing purposes.** Sending you emails and messages about new features, products and services, and content;
7. **Securities.** By collecting your Personal Data, we safeguard the Website and the Offerings from being abused by any spam attacks, or fraud. To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.

We will only process your Personal Data for the purposes we collected it for or for compatible purposes. If we need to process your Personal Data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your Personal Data without your knowledge or consent only where required by applicable law or regulation.

We consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of this information, the purposes for which we process your Personal Data, and whether we can achieve those purposes through other means, and the applicable legal requirements when determining the appropriate retention period for personal information.

## **VI. Sharing Your Personal Data**

In the context of processing your Personal Data in accordance with this Policy, we may communicate your Personal Data to the following recipients, if necessary:

1. our subsidiaries or affiliates (if any) only if necessary for operational purposes;
2. other third-party service providers, external suppliers, contractors, and agents to the extent that they assist us in carrying out the purposes set out in this Policy (e.g., analytics and storage service providers to assist us in the improvement and optimization of the Offerings; product engineering providers and technical maintenance vendors to ensure proper functioning of the Offerings; marketing and communication providers to promote the use of the Offerings; compliance and screening service providers to comply with applicable laws and regulations and ensure safe environment within the Offerings);
3. competent courts, public authorities, government agencies, and law enforcement agencies to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or

law enforcement officials, or private parties, including but not limited to in response to subpoenas, search warrants, or court orders;

4. third parties in connection with a merger, division, restructuring, change of control, bankruptcy or other organizational change;
5. third parties which may collect your Personal Data on our Offerings via cookies, web beacons, and similar tracking technologies, subject to your prior consent;

We will only communicate your Personal Data to any recipient on a need-to-know basis and only when the processing by the recipient is strictly limited to the purposes identified in this Policy. We do not sell your Personal Data.

## **VII. Transfer of Personal Data**

As we operate globally, we may process your Personal Data in countries outside the European Economic Area (“EEA”). In these cases, we implement appropriate transfer mechanisms and safeguards to ensure that your Personal Data benefits from a level of protection essentially equivalent to that within the EEA.

In practice, this means that each of the envisaged transfers is at least based on one of the following mechanisms:

- the existence of an adequacy decision issued by the European Commission for the country to which your Personal Data is transferred; or, failing that,
- the conclusion of the European Commission’s Standard Contractual Clauses, combined with supplementary technical, contractual, and/or organizational measures where required following a transfer impact assessment; or, failing that,
- a specific derogation permitted under Article 49 GDPR. These derogations are applied only in exceptional cases, for example where you have explicitly consented to the transfer after being informed of the possible risks, or where it is required for the establishment, exercise, or defence of legal claims, or where the transfer is necessary for legal requirements or important reasons of public interest such as compliance with applicable law obligations or lawful requests from government authorities or courts. Information on the transfer mechanisms and safeguards may be requested by contacting us: please see Section XIV of this Policy (Contact us).

## **VIII. Data Retention**

We will only store your Personal Data on our systems for the necessary period to serve the outlined purposes or obligations by the applicable law (for example for bookkeeping or mandatory archiving purposes). The Personal Data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected, and the storage period prescribed by the applicable law expires.

## **IX. Securing your Personal Data**

Degensoft implements a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information.

Degensoft uses appropriate physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and modification of personal information. Degensoft provides security such as data encryption and physical access controls to its servers. Your Personal Data is also protected through confidentiality undertakings entered into by all persons processing your Personal Data.

Degensoft is committed to doing its best effort in protecting the information We receive from You.

However, Degensoft will not be liable for disclosures of your Personal Data due to errors in transmission or unauthorized acts of Third-Parties. We have undertaken commercially reasonable efforts to prevent unauthorized Internet access to visitor data retained in our servers. However, due to the inherent open nature of the Internet, we ensure or warrant the security of any information you provide us, and you do so at your own risk. Users must accept all risks associated with any data transmission, including the risk that their Personal Data may be intercepted in transit.

#### **X. Cookies and Other Tracking Technologies**

Cookies and similar tracking technologies, such as "Flash" cookies, "local storage", etc., (the "cookies") are text files that can be stored on your devices when you visit an online service such as an application or a website. Cookies are used to store information on the user's device so that it can be accessed later.

As you navigate through and interact with the Offerings, different types of cookies may be placed on your device and we may ask your consent to use those cookies. These cookies may be placed directly by us or by third parties. The data we collect automatically includes statistical and performance information arising from your use of the Offerings. This type of data will only be used by us in an aggregated or anonymized manner.

Except for cookies that are necessary for the proper functioning of the Offerings, you are free to refuse the deposit of cookies on your device at any time. If you do not want cookies to be placed or read on your device and choose this option when presented to you, a refusal cookie will be stored on your device so that we can keep track of your choice. If you delete this cookie, we will no longer be able to know that you have refused the use of cookies. Similarly, when you consent to accept cookies, a consent cookie is placed on your device.

You can choose to disable cookies through your individual browser options. The settings for each browser are different. They are described in the help menu of your browser, which will enable you to know how to change your cookies preferences. For example:

- in Microsoft Edge please refer [here](#).
- in Safari please refer [here](#).
- in Chrome please refer [here](#).

- in Firefox please refer [here](#).
- in Opera please refer [here](#).

In addition, to disable Google Analytics cookies, you can use the following [hyperlink](#) and download the Google Analytics Opt-Out Browser Add-on.

Alternatively, [www.allaboutcookies.org](http://www.allaboutcookies.org) provides further information on how to manage your cookies preferences.

## **XI. Children's Data**

The Offerings are intended for use by individuals who are at least eighteen (18) years old and are not directed at children. We do not knowingly collect personal information from children. If you believe that such information has been collected in error, please contact us using the details provided in Section XIV of this Policy (Contact Us).

## **XII. Your Rights**

Your rights associated with the processing of your Personal Data are outlined below. Please note that some of these rights are subject to specific conditions set out in the applicable personal data protection regulation. Therefore, if your particular situation does not meet these conditions, we will unfortunately not be able to respond to your request. In this case, we will inform you of the reasons for our refusal.

### **Your rights under the General Data Protection Regulations ("GDPR")**

1. **Right of access** – You may request access to your Personal Data at any time. If you exercise your right of access, we will provide you with a copy of the Personal Data we hold about you as well as information relating to its processing.
2. **Right of rectification** – You have the right to ask us to rectify or complete any Personal Data in our possession that you consider to be inaccurate or incomplete.
3. **Right to erasure / to be forgotten** – You may request deletion of your Personal Data when it is no longer necessary for the purposes for which it was processed. However, if we are required by law (for example, compliance or regulatory obligations under applicable law, or ongoing legal or investigative proceedings) to retain certain data, we may not be able to erase such data until the legal obligation has been satisfied. In such cases, we will inform you of the reason why deletion cannot be performed.
4. **Right to restriction of processing** – You may also request that we restrict the processing of your Personal Data on grounds relating to your particular situation. For example, if you dispute the accuracy of your Personal Data or object to the processing of your Personal Data, you may also request that we do not process your Personal Data for the time necessary to verify and

investigate your claims. In such cases, we will temporarily refrain from processing your Personal Data until necessary verifications have been made or until we comply with your requests.

5. **Right to data portability** – You may request portability of the Personal Data you have provided us with. At your request, we will provide you with your Personal Data in a readable and structured format, so you can easily re-use it. The portability of your Personal Data applies only to Personal Data that you have provided to us or that result from your activity on the Offerings, under the condition that the disclosure of your Personal Data does not infringe the rights of third parties. If we are unable to comply with our request, we will inform you of the reasons for our refusal.
6. **Right to object** – You may object at any time, on grounds relating to your particular situation, if we use your Personal Data. We will then stop processing of your Personal Data unless there are overriding legitimate grounds for continuing to process your Personal Data (for example, if your Personal Data is necessary for the establishment, exercise, or defence of our rights or the rights of third parties in court proceedings). If we are unable to comply with your request to object, we will inform you of the reasons for our refusal. You can also object at any time to our processing of your Personal Data for marketing purposes.
7. **Right to withdraw consent** – You have the right to withdraw consent at any time for processing of your Personal Data based on consent. Withdrawing your consent prevents us from processing your Personal Data but does not affect the lawfulness of the processing carried out before the withdrawal.

#### **Your rights under the California Consumer Privacy Act (“CCPA”)**

If you are a resident of California, you have specific rights concerning your Personal Data under the California Consumer Privacy Act (“CCPA”). The CCPA provides you with the right to:

- Know the categories and specific pieces of personal information we collect about you, the categories of sources from which it is collected; the purposes for which it is used; and the categories of third parties with whom it is shared or disclosed.
- Access a copy of the Personal Data we maintain about you.
- Correct inaccurate Personal Data we hold about you.
- Delete your Personal Data, subject to certain statutory exceptions.
- Limit the use and disclosure of sensitive personal information, if applicable.
- Opt out of the “sale” or “sharing” of your Personal Data, including for cross-context behavioral advertising purposes. Please note that we do not sell your Personal Data as defined under California law.

You may also designate an authorized agent to submit requests on your behalf. We will take steps to verify your identity, and if applicable, the authority of your agent, before fulfilling any request.

#### **Your Rights under the DIFC Data Protection Law (DIFC Law No. 5 of 2020)**



If you are located in the Dubai International Financial Centre (“**DIFC**”), you have specific rights regarding the processing of your Personal Data under the Data Protection Law, DIFC Law No. 5 of 2020 (“**DIFC DPL**”).

- **Right to Access** – You have the right to request confirmation of whether we process your Personal Data and, if so, to receive a copy of the Personal Data we hold about you together with information about how we process it.
- **Right to Rectification** – You have the right to request that we correct or complete any inaccurate or incomplete Personal Data we hold about you.
- **Right to Erasure** – You may request that we delete your Personal Data in certain circumstances, for example where the data is no longer necessary for the purposes for which it was collected. We may not be able to comply with your request if continued retention is required to fulfil a legal or regulatory obligation, to establish or defend legal claims, or for other lawful grounds permitted under the DIFC DPL. If deletion cannot be carried out, we will inform you of the reason.
- **Right to Restriction of Processing** – You may request that we restrict the processing of your Personal Data in specific circumstances, such as when you contest the accuracy of your Personal Data or object to the processing. Where processing is restricted, we will continue to store your Personal Data but will not process it further without your consent, except where legally permitted.
- **Right to Data Portability** – Under certain conditions, you may request that we provide your Personal Data to you in a structured, commonly used, and machine-readable format, or transfer it directly to another controller where technically feasible. This right applies only to Personal Data you have provided to us and that is processed by automated means.
- **Right to Object** – You have the right to object, on grounds relating to your particular situation, to the processing of your Personal Data, including processing based on our legitimate interests. We will stop processing your Personal Data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or where processing is required for the establishment, exercise, or defence of legal claims. You may also object at any time to the processing of your Personal Data for direct marketing purposes.
- **Right Not to Be Subject to Automated Decision-Making** – You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning you, except where such processing is permitted by law, necessary for a contract, or carried out with your explicit consent. In such cases, you may request human review of the decision.
- **Right to Withdraw Consent** – Where we rely on your consent to process your Personal Data, you may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.
- **Right to Lodge a Complaint** – You have the right to lodge a complaint with the DIFC Commissioner of Data Protection if you believe your rights have been infringed. We encourage you to contact us first so we may address your concerns.

These rights are subject to limitations as described in the relevant law. We may deny your request if we need to do so to comply with our legal rights or obligations. We will respond to requests for access, correction, or deletion to the extent we can reasonably associate the data we hold with the identifying information you provide. If we are unable to comply with your request, we will notify you and explain the reasons.

**Country Specific Rights:** You may also be granted specific rights as regards our processing of your Personal Data depending on the law applicable in the country you are residing in. You may contact us should you have any questions in that regard.

### **XIII. How to exercise your rights**

If you wish to exercise your rights, you may contact us by using the contact information provided in Section XIV of this Policy (Contact Us).

To be able to process your request efficiently, we may ask you to provide additional information to confirm your identity and/or to help us retrieve the Personal Data related to your request.

If you are a California resident, you may also designate an authorized agent to submit a request on your behalf. The agent must present signed written permission from you authorizing them to act on your behalf. We reserve the right to deny the agent's request if we are not reasonably able to confirm proper authorization and/or verify your identity as the requestor.

If you reside in the EEA, you can lodge a complaint with a data protection authority. You can find a list of the relevant supervisory authorities here. However, we encourage you to contact us first, as we are committed to addressing any concerns or complaints you may have regarding the processing of your Personal Data promptly and efficiently.

If you are located in DIFC, you may exercise your rights under the Data Protection Law, DIFC Law No. 5 of 2020, by contacting us using the details provided in Section XIV. We may request additional information to verify your identity and to confirm that your request meets the conditions set out in the DIFC Data Protection Law. You also have the right to lodge a complaint with the DIFC Commissioner of Data Protection if you believe your rights have been infringed. However, we encourage you to contact us first, as we are committed to addressing any concerns or complaints you may have regarding the processing of your Personal Data promptly and efficiently.

### **XIV. Contact Us**

If you have any questions regarding the processing of your Personal Data under this Policy, including the exercise of your rights as detailed above, you can contact us by email at [info@degensoft.ae](mailto:info@degensoft.ae).

### **XV. Changes to this Privacy Policy**

We periodically review this Policy to ensure it is compliant and up to date with applicable data protection regulations. We will post updates on this page accordingly. When the changes are made, we will update the “Last updated” date at the top of this Policy.

Therefore, we encourage you to review this Policy regularly. Any modifications will take effect when posted or on the date specified as the effective date (if any). Your continued access to and use of the Offerings indicates your acknowledgment and acceptance of the updated Privacy Policy.