# **Privacy Policy**

#### for uavprofsim.com ("Website")

This Privacy Policy ("**Policy**") explains how UAVPROF SOFTWARE – FZCO, a Free Zone Company incorporated in Dubai, United Arab Emirates (License No. 60484) ("**Site Owner**", "we" or "us"), collects, uses, discloses and safeguards personal data when you use our Website, the Software (as defined below) or other services (collectively, the "**Services**").

By accessing or using our Services, you acknowledge that you have read and understood this Policy and consent to the processing of your personal data as described herein. If you do not agree with this Policy, please do not use our Website or Services.

We primarily comply with the UAE Personal Data Protection Law (Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data – "PDPL"). Depending on your place of residence, additional data protection rules may apply to you, such as the EU General Data Protection Regulation ("GDPR"), the UK Data Protection Act 2018, or other applicable national laws.

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#### 1. Definitions

**Company / Site Owner** (also referred to as "we", "our" or "us") means UAVPROF SOFTWARE – FZCO, a Free Zone Company duly incorporated under the laws of the United Arab Emirates and licensed by the Dubai Integrated Economic Zones Authority (License No. 60484), with its registered office at DSO-IFZA Properties, Dubai Silicon Oasis, Dubai, UAE.

**Website** means the Internet website operated by the Company on the domain https://uavprofsim.com.

**Software** means UAVPROF Drone Simulator professional flight simulation software (including versions such as Base ("Standard"), Premium ("Professional"), and Dev ("Developer")), developed for training of unmanned aerial vehicle (drone) operators using realistic simulations to recreate natural flight conditions. The Software includes software and databases owned by the Licensor by exclusive right or used by the Licensor on another legal basis. The Software may also include related documentation, data files, modules, libraries, electronic data, models, components and elements. The Software may include updates, upgrades, bug fixes, modifications, or new editions provided by Licensor to User under the End-User License Agreement or under a separate agreement. Updates, upgrades, or new versions are not included with a perpetual license and may require a separate purchase, as specified in the EULA.

**Services** mean the Website, the Software, and any related digital or support services (such as account registration, licence activation, updates, customer support, and training features) provided by the Company to Users, whether for business (B2B) or consumer (B2C) purposes.

**User** (also referred to as "you") means any individual or entity accessing or using the Services, either as an individual end-user or on behalf of a business or organization.

**Personal Data** means any information relating to an identified or identifiable natural person ("**Data Subject**"). Examples include a name, email address, identification number, location data, IP address, device identifiers, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a person.

**Processing** means any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination, alignment, restriction, erasure, or destruction.

**Cookies** mean small pieces of data sent by the Website server and stored on your device in order to optimise the performance of the Website. The use of cookies on the Website is governed by the Cookies Policy <a href="https://uavprofsim.com/documents/">https://uavprofsim.com/documents/</a>.

**Consent** means a freely given, specific, informed, and unambiguous indication of a Data Subject's agreement to the Processing of their Personal Data.

**PDPL** means the United Arab Emirates Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, as amended from time to time.

**GDPR** means the EU General Data Protection Regulation (Regulation (EU) 2016/679), which may apply to Users located in the European Economic Area.

**Cross-border transfer** means any transfer of Personal Data outside the United Arab Emirates, including to a foreign country, authority, or international organization, subject to the safeguards required by the PDPL.

#### 2. About this Policy

This Policy explains what categories of Personal Data we process, the purposes and methods of such Processing, and the measures we take to protect your information.

This Policy applies to all Personal Data collected by the Company in connection with the operation of the Website and the provision of the Services, including the Software.

This Policy applies globally to all Users of our Services, regardless of their country of residence, unless local mandatory laws provide otherwise.

With regard to the Processing of Personal Data by third parties, this Policy applies only where such third parties receive Personal Data from us as data processors or service providers acting on

our behalf. This Policy does not apply to Personal Data collected directly by third parties through their own websites, applications, or cookies; in those cases, their own privacy policies apply.

This Policy has been developed in accordance with the PDPL. Depending on your place of residence, additional data protection rules may apply to you, such as the GDPR, the UK Data Protection Act 2018, or other applicable national laws.

#### Language

This Privacy Policy is provided in the English language. An Arabic translation may be provided for convenience and to meet local legal requirements. In the event of any inconsistency between the English and Arabic versions, the English version shall prevail, unless mandatory provisions of the laws of the United Arab Emirates require the Arabic version to prevail, in which case the Arabic version shall take precedence to the extent of such requirement.

#### Visitors

When you visit our Website without creating an account or purchasing our Services, we may still collect limited technical information automatically, such as your IP address, browser type, device information, language and time zone settings, and your interactions with our Website. We may also use analytics tools (e.g., Google Analytics or similar services) to understand how visitors use our Website and to improve its functionality.

We also use cookies and similar technologies to operate our Website and improve user experience. For details on the types of cookies we use and how you can manage your preferences, please see our Cookie Policy (<a href="https://uavprofsim.com/documents/">https://uavprofsim.com/documents/</a>).

#### 3. What information about Users do we collect?

We collect different categories of information to operate, provide, and improve our Services. The specific Personal Data we collect depends on how you interact with our Website and Software.

## 3.1. Personal information you provide to us

You may choose to provide certain Personal Data directly, for example when you register an account, purchase a licence, contact our support team, or participate in training activities.

This may include:

- *Account registration data:* first name, last name, middle name (if provided), username, email address, password.
- *Purchase and licence information:* details of the licences you acquire (e.g., edition, duration, activation key). Payment card details are processed exclusively by our payment providers; we do not store your full payment card or bank account information.
- *Billing and residence information:* country of residence, billing address, VAT or tax identification number (if applicable).
- *Support and communications:* name, email address, and the content of any messages you send to us (for example, feedback, inquiries, or support requests).
- *Optional information:* if you participate in surveys or beta programs, we may collect additional information such as organization name, job role, or preferences.

You may choose not to provide certain information, but this may limit your ability to use some features of the Services.

#### 3.2. Personal information from other sources

We may receive information about you from third parties, such as:

- Payment service providers: confirmation of payment status, transaction reference, and fraud-prevention signals.
- Resellers, distributors, or training partners: if you obtain our Software through an authorized partner, we may receive your name, contact details, and licence information to activate your access.
- Authentication providers: if you log in using a single sign-on (such as Google), you
  authorize us to receive basic profile information from that provider in line with your
  privacy settings there.

We do not collect or store your full credit card numbers, bank account numbers, or other sensitive financial data.

### 3.3. Software usage data

When you use the Software, we may collect limited telemetry and usage data in order to operate the Software and improve your experience. This may include:

- session identifiers, training modules started or completed, drone models selected, and performance metrics (e.g., scores or progress reports);
- training achievements and certification data, including successful completion of required modules in order to issue a certificate or progress report;
- software configuration (e.g., language, device type, operating system version);
- crash reports, diagnostic logs, and error reports.

We use this data to deliver the Services, issue training progress reports or certificates (if applicable), troubleshoot errors, enhance performance, and ensure fair use of the Software.

# 3.4. Automatically collected information

When you access our Website, certain technical information is collected automatically, such as:

- Internet Protocol (IP) address;
- browser type, operating system, and device information;
- language and time zone settings;
- interactions with the Website (e.g., pages visited, features used).
- geolocation data (if you enable location services on your device or browser).

This information is collected using cookies and similar technologies. For more details on the cookies, we use and how you can manage your preferences, please see our Cookie Policy (https://uavprofsim.com/documents/).

# 3.5. User-generated content (if applicable)

If our Services allow Users to submit, upload, or publish content (such as comments, queries, or forum posts), we may collect and store such content together with related metadata (for example, the date and time of submission).

### 4. Special categories of personal data

We do not knowingly collect or process special categories of Personal Data, namely information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union

membership, genetic or biometric data, health data, or data concerning a natural person's sex life or sexual orientation.

We also do not process criminal record information or data relating to children under the age of 18 without parental or legal guardian consent.

If, in exceptional circumstances, the Processing of such data becomes necessary to comply with applicable laws or to provide specific Services with your explicit consent, we will ensure that the requirements of the PDPL are fully observed.

### 5. Children's personal data

According to our Terms of Service, the minimum age requirement for creating an account and using our Services is 18 years, unless a lower age threshold is permitted by the laws of your country of residence and parental or legal guardian consent is obtained.

We do not knowingly collect or process Personal Data of individuals under 18 years old without the consent of their parents or legal guardians.

If we become aware that we have collected Personal Data from a child without the required consent, we will take steps to delete such information promptly.

IF YOU ARE UNDER THE AGE OF 18 YOU MAY NOT USE THE WEBSITE OR SERVICES, UNLESS A LOWER AGE LIMIT APPLIES IN YOUR COUNTRY OF RESIDENCE AND PARENTAL OR LEGAL GUARDIAN CONSENT IS PROVIDED ACCORDINGLY

#### 6. Cross-Border Data Transfers

We are based in the United Arab Emirates. As part of providing our Services, your Personal Data may be transferred to and processed in countries outside the UAE. This may include countries where data protection laws are different from, and may not provide the same level of protection as, those in your country of residence.

Whenever we transfer Personal Data outside the UAE, we ensure that such transfers are carried out in compliance with the PDPL and other applicable laws. This may include implementing one or more of the following safeguards:

- *Adequacy decisions* transferring data to countries officially recognised by the UAE Data Office as providing an adequate level of protection.
- Contractual safeguards using standard contractual clauses, data transfer agreements, or
  other legally binding instruments to ensure that your Personal Data is subject to
  equivalent protection.
- *Explicit consent* transferring your Personal Data with your explicit consent after informing you of the possible risks.
- *Other lawful bases* where transfer is necessary for the performance of a contract with you, for the establishment or defence of legal claims, or to protect your vital interests.

By using our Services, you acknowledge that your Personal Data may be transferred to and processed in jurisdictions outside your country of residence.

#### 7. How do we use your personal information?

We process your Personal Data to operate, provide, develop, and improve our Services. These purposes include:

*Functioning of the Website and Software,* including allowing Users to create and manage accounts, purchase and activate licences, and access the Software.

*Provision of Services,* in accordance with our contractual obligations to registered Users pursuant to the Terms of Service and End-User Licence Agreement.

*Troubleshooting and product improvement,* including analysing performance, fixing errors, and enhancing the usability and effectiveness of the Services.

*Training*, including recording training progress, and generating performance reports.

*Personalisation of the User experience,* such as saving User's settings and authorisation status, and providing customised features or recommendations.

*Communication with Users,* including informing you about updates, collecting feedback, responding to inquiries, and resolving disputes.

Facilitating the exercise of data subject rights, ensuring that Users can access, update, or delete their Personal Data in accordance with applicable law.

*Marketing and promotions,* including sending newsletters, promotional or advertising materials, and personalised offers, where permitted by law and subject to your prior consent. You may withdraw consent to receive marketing communications at any time.

*Fraud prevention, abuse detection, and security,* including preventing unauthorised or unlawful activities, conducting security investigations, and enforcing compliance with our Terms of Service and applicable law.

*Compliance with legal obligations,* including those arising under the PDPL and other applicable data protection laws.

We do not make decisions affecting your rights and legitimate interests based solely on automated Processing of your Personal Data.

We retain your Personal Data for as long as your account remains active, and for as long as necessary to fulfil the purposes outlined above, unless a longer retention period is required by law.

## 8. What is our legal basis for Personal Data Processing

Our legal basis for collecting and using your Personal Data depends on the scope and the specific purpose for which we process such information. We rely on one or more of the following grounds:

- *Contractual necessity:* to fulfil our obligations to registered Users with regard to the provision of Services under the Terms of Service or End-User Licence Agreement.
- *Consent:* where you have provided explicit consent, for example, to receive marketing communications. You may withdraw consent at any time.
- *Legitimate interests:* to improve and secure our Website and Services, prevent fraud and abuse, and provide Users with the best possible experience, provided that such interests are not overridden by your fundamental rights and freedoms.
- *Legal obligations:* to comply with the requirements of applicable laws, including the PDPL and other data protection regulations.
- *Protection of vital interests:* where processing is necessary to protect your life, safety, or the vital interests of others.
- *Public interest (where applicable):* where processing is required for reasons of substantial public interest as permitted by applicable law.

Where Personal Data is transferred outside the UAE, such Processing will be based on the legal mechanisms and safeguards required under the PDPL.

#### 9. Do we share your personal information?

We are not in the business of selling Users' Personal Data. We only share your Personal Data with third parties where necessary for the operation of our Services, to comply with legal obligations, or with your consent.

- *Service providers (processors):* To operate the Website and the Software, we may use third-party hosting, storage, IT, and support providers. Such providers process Personal Data strictly on our instructions and under data protection agreements.
- Payment and billing providers: We may share limited information with payment gateways and billing service providers in order to process payments and issue invoices. We do not store your full payment card details.
- Resellers, distributors, and training partners: If you obtain a licence or training package through an authorised partner, we may share relevant account and licence data with that partner to activate your Services and track your training progress.
- *Analytics providers:* We may share pseudonymised usage data with analytics service providers in order to compile aggregated statistics about the effectiveness and performance of our Services.
- Advertising partners (if applicable): If our Website contains third-party advertising or links, such partners may collect information about you when you interact with their content, subject to your cookie preferences. We are not responsible for how third-party sites process your data once you leave our Website.
- Business transfers: In the event of a merger, acquisition, or sale of assets, your Personal Data may be transferred as part of the business continuity process, subject to appropriate safeguards.
- Legal compliance and protection: We may disclose your Personal Data if required by applicable law, court order, or lawful request by government authorities, or where disclosure is necessary to protect the rights, property, or safety of the Company, our Users, or others.

Where third-party providers process Personal Data on our behalf, we require them to comply with confidentiality and security obligations equivalent to those set out in this Policy.

Some of these third parties may be located outside the United Arab Emirates. In such cases, we will only transfer Personal Data in compliance with the PDPL, using mechanisms such as adequacy decisions, contractual safeguards, or your explicit consent.

### 10. How secure are your personal data?

We design our systems with your security and privacy in mind, and apply the principles of privacy by design and by default.

We deploy industry-standard technical, physical, and administrative safeguards to ensure the confidentiality, integrity, and availability of the Personal Data we process. These measures may include encryption, access controls, network security, and pseudonymisation, and are reviewed and updated on a regular basis. Access to Personal Data is restricted to authorised personnel on a strict "need-to-know" basis.

No security measures are perfect or impenetrable. In the event of a personal data breach, we will take all reasonable steps to contain and mitigate the incident. Where required by the PDPL or other applicable laws, we will notify the relevant supervisory authority and affected Users without undue delay.

Although we do our best to protect your Personal Data, we cannot guarantee the security of data transmitted over the Internet. Any transmission is at your own risk.

You are also responsible for maintaining the security of your account credentials. Please keep your password confidential and do not disclose it to third parties.

# 11. What are your rights?

Under the PDPL and, where applicable, the GDPR, you have the following rights in relation to your Personal Data:

*Right to be informed* – to be informed about how we collect and use your Personal Data (as explained in this Policy).

*Right of access* – to request a copy of the Personal Data we hold about you.

*Right of rectification* – to request that we correct or update inaccurate or incomplete Personal Data.

*Right to erasure ("right to be forgotten")* – to request the deletion of your Personal Data in certain circumstances (unless we are legally required or have overriding legitimate grounds to continue processing).

*Right to restriction of processing* – to request that we temporarily suspend the processing of your Personal Data.

Right to data portability – to obtain your Personal Data in a structured, commonly used, and machine-readable format, and to request transfer to another controller, where technically feasible.

*Right to object* – to object to the processing of your Personal Data, including the right to object to direct marketing.

*Rights in relation to automated decision-making and profiling* – to not be subject to a decision based solely on automated processing that produces legal or similarly significant effects.

*Right to withdraw consent* – where Processing is based on your consent, you may withdraw that consent at any time.

*Right to lodge a complaint* – to file a complaint with the UAE Data Office, your local data protection authority (if applicable), or directly with us.

For minors, these rights may be exercised on their behalf by their parents or legal guardians.

These rights are subject to certain legal limitations and conditions.

### 12. How to contact us

You may at any time send to us an inquiry, request or complaint related to the use of your personal data, or to the exercise of your rights, to the e-mail address <a href="mailto:sim@uavprof.com">sim@uavprof.com</a>.

#### 13. Final Provisions

We reserve the right to revise, amend, or modify this Policy from time to time in order to reflect changes in our practices, legal requirements, or other factors.

When we make changes, we will:

- update the "last updated" date of this Policy;
- publish the revised version on our Website; and
- notify Users of material changes in a clear and timely manner, for example via email or through an in-Service notice, prior to the changes taking effect.

The new version of the Policy will come into force as of its publication date on the Website, unless otherwise required by applicable law.

Where required by law, we will obtain your consent to material changes.

Last updated: October 2025