Privacy Policy

There are many ways you can use our services – to share information, to communicate with other people, or to create new content.

When you share information with us, for example by creating an account with us, we can make those services even better – to help you connect with people or to make sharing with others quicker and easier. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Where our processing of your information is covered by the General Data Protection Regulation, or theapply to you.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses and browsers, then read about these key terms first. Your privacy matters to us; whether you are new to LAEQ365 or a long-time customer, please do take the time to get to know our practices – and if you have any questions, contact us.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used and control who you share information with. By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services may not function properly if your cookies are disabled. For example, you may not be able to login to LAEQ365 or utilise other services.

Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like what content of ours matters most to you.

We collect information in the following ways:

- Information you give us. We collect information about you and your company as you register for an account with us, create or modify your profile, use, access, or interact with our services or our websites (including but not limited to when you upload, download, collaborate on or share content, including photos and videos). Such content includes any personal information or other sensitive information that you choose to include. For example, many of our services require you to sign up for an account with us. When you do, we'll ask for personal information, like your name, email address, telephone number or credit card. We may present your name, email address or image to other users in your organisation, or otherwise associated with your account in order to assist in sharing or recommendations.
- Information we get from your use of our services. We may collect information about the services that you use and how you use them, like when you visit a website that uses our services or you view and interact with our content. This information includes:
 - **Device information** We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). We may associate your device identifiers or phone number with your account.
 - Log information When you use our services or view content provided by us, we may automatically collect and store certain information in server logs.
 This may include:
 - details of how you used our service, such as your search queries;
 - telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls;
 - Internet Protocol address;
 - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL; and

- cookies that may uniquely identify your browser or your account.
- Contact information When you choose to use the LAEQ365 services to
 invite members of your contact list to view an action or a template, or be part
 of your organisation, we may collect, sync and store certain contact
 information such as names, phone numbers and email addresses. This
 information may be sent to our servers for the purposes of providing those
 members of your contact list with an invitation to participate in the LAEQ365
 services as directed by you.
- Location information When you use a location-enabled LAEQ365 service, we may collect and process information about your actual location, like GPS signals sent by a mobile device. We may also use various technologies to determine location, such as sensor data from your device that may, for example, provide information on nearby Wi-Fi access points and cell towers.
- Unique application numbers Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to us when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.
- **Local storage** We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.
- Cookies and anonymous identifiers We use various technologies to
 collect and store information when you visit our services, and this may
 include sending one or more cookies or anonymous identifiers to your
 device. We also use cookies and anonymous identifiers when you interact
 with services we offer to our partners, such as advertising services or
 LAEQ365 features that may appear on other sites.

How we use information we collect

We may use the information we collect, including your personal information and transaction information, from all of our services in any one or more of the locations that LAEQ365 has operations or otherwise conducts business (these locations currently being KSA) for the following purposes:

- for internal and service-related purposes, such as to provide, maintain, protect, improve, and personalise our services, to develop new ones and to protect the rights, property, or safety of LAEQ365 and our users;
- to communicate with you in order to provide you with information we think may be useful or relevant to you;
- to promote our services and related services;
- to analyse information in order to offer aggregated anonymised data products to third parties;
- to facilitate the sharing of aggregated and anonymised information with third
 parties, including transaction data. An example of anonymised information would
 be the number of times a template is used or location data, which may be used by
 those third parties to inform judgements about the organisation using the software,
 but not about any individuals whose data is processed using the software;
- to enforce the Privacy Policy and our terms and conditions for use of our services and websites;
- to monitor and analyse trends, usage, and activities in connection with our services and for marketing or advertising purposes or to offer you tailored content;
- to investigate and prevent fraudulent transactions, unauthorised access to or use of our services, and other illegal or unusual activities;
- to use the name you provide for your LAEQ365 profile across all of the services we
 offer that require a LAEQ365 account. In addition, we may replace past names
 associated with your LAEQ365 account so that you are represented consistently
 across all our services. If other users already have your email, or other information
 that identifies you, we may show them your publicly visible LAEQ365 profile
 information, such as your name and photo;
- when you contact us, to keep a record of your communication to help solve any
 issues you might be facing. We may use your email address to inform you about our
 services, such as letting you know about upcoming changes or improvements;
- from cookies and other technologies, to improve your user experience and the overall quality of our services;
- to combine information from one service, including personal information, into other LAEQ365 services – for example to make it easier to share things with people you know;

• as otherwise stated in this Privacy Policy.

To use the information we collect, we may require our systems to access, screen capture, store, video and/or scan your information. Where appropriate or required by data protection laws, we will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Retention of Personal Data

We will retain your personal information for the time necessary to provide the services we perform for you, or to achieve other purposes outlined in this Privacy Policy, and you can always request that we stop processing or delete your personal information.

We're required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

We may need to retain certain personal information after we cease providing you with products or services to enforce our terms, for fraud prevention, to identify, issue or resolve legal claims and/or for proper record keeping.

Disclosure of personal information outside KSA.

LAEQ365 processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

We may disclose personal information outside of KSA to third parties for the purposes outlined in this Privacy Policy.

By providing us with personal information, you consent to the disclosure of your personal information to third parties who reside outside KSA. Where we disclose your personal information to third parties, we will take reasonable steps to ensure that any overseas recipient will deal with such information in a way that is consistent with the Saudi Privacy Principles.

Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines. Our services provide you with different options on sharing and removing your content.

Information we share

We do not share personal information with third parties unless one of the following circumstances apply:

With your consent

We will share personal information with companies, organizations or individuals outside of LAEQ365 when we have your consent to do so.

With account administrators

If your account is managed for you by an organisation administrator then your organisation's administrator and resellers who provide user support to your organization will have access to your information (including your email and other data).

Your account administrator may be able to:

- view statistics regarding your account;
- change your account password;
- suspend or terminate your account access;
- · access or retain information stored as part of your account;
- receive your account information in order to satisfy applicable law,
 regulation, legal process or enforceable governmental request;
- restrict your ability to delete or edit information.

Please refer to your account administrator's and reseller's privacy policy for more information.

With Third Party Service Providers

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage or management, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, customer lifecycle management providers, data analytics or reporting providers, finance systems, cyber security providers, project management or collaboration providers, testing, research and alert tools, email service providers and payment systems operators;
- our existing or potential agents or business partners;

• third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you.

• To address fraud, security or technical issues

We will share your personal information with trusted third parties where necessary to detect, prevent or otherwise address fraud, security or technical issues.

For legal reasons

Merger or acquisition

If we merge with or are acquired by another business, we may share your personal information with the new owners of the business and their advisors. We will continue to ensure the confidentiality of any personal information and give affected users notice (for example, via a message to the email address associated with your account) before personal information is transferred or becomes subject to a different privacy policy.

We may share aggregated, non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services. This could also include government bodies, industry groups, insurers and educational/training facilities.

Information security

We have put in place robust measures regarding the security of the information we collect and store about you (including through the use of network and database security measures) and will use our reasonable endeavours to protect your personal data from unauthorised access to or unauthorised alteration, disclosure or destruction. In particular:

- We encrypt many of our services using Secure Sockets Layer (SSL) or Transport Layer Security (TLS).
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us, and who are

subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

- We have multiple authentication and access control measures to ensure data is only accessed by authorised personnel.
- We enforce strong encryption of all data at rest through the use of the Advanced Encryption Standard (AES-256).

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our servers via third party networks; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Application

Our Privacy Policy applies to all of the services offered by LAEQ365 and its affiliates, including services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include LAEQ365 services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services.

Enforcement

We regularly review our compliance with our Privacy Policy. We also adhere to several self regulatory frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Restrict

You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

Access

You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information, we may refuse to provide you with personal information that we hold about you.

Correction

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Complaints

If you believe that we have breached the Saudi Privacy Principles and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

Other Websites

Please note that clicking on links and banner advertisements on our websites can result in your browser accessing a third party website, where data privacy practices are different to that of LAEQ365.

We are not responsible for, and have no control over, information that is submitted to or collected by these third parties and you should consult their privacy policies.

Changes

We may revise this Privacy Policy from time to time and will post the most current version on our website. If a revision meaningfully reduces your rights or involves a material change to our processing your personal information, we will notify you.

Contact

If you have any enquiries or if you would like to contact us about our processing of your personal information, please contact us by any of the methods below. When you contact us, we will ask you to verify your identity.

Contact name: Privacy Officer
Email:

Telephone: 920008123

Appendix 1 - Your Rights

(a) GDPR

For the purpose of this Privacy Policy the controller of personal data is LAEQ365 and our contact details are set out in the Contact section above.

The Legal Basis for Processing your Information

Under GDPR, the main grounds that we rely upon in order to process personal data collected via our websites and services are the following:

- Necessary for entering into, or performing, a contract
 – in order to perform
 obligations that we undertake in providing a service to you, or in order to take steps
 at your request to enter into a contract with us, it will be necessary for us to process
 your personal data;
- Necessary for compliance with a legal obligation—we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- Necessary for the purposes of legitimate interests— either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website, applications and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;
- **Consent** in some circumstances, we may ask for your consent to process your personal data in a particular way.

Third Party Service Providers

As mentioned above, we will share your personal information with trusted third parties where we have retained them to provide services that you or our clients have requested, and to perform maintenance or respond to technical incidents affecting our services. A list of sub-processors currently engaged by LAEQ365 is published here.

Where we disclose personal information to third parties, we require minimum standards of confidentiality and data protection from such third parties.

Processing Outside of KSA

To the extent that any personal information is provided to third parties outside the KSA, or who will access the information from outside the KSA, we will ensure that approved safeguards are in place to ensure that we comply with GDPR, such as

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LAEQ365 processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live, including outside the KSA. We use data centres operated by our third-party cloud hosting provider, Amazon Web Services ("AWS") to store user data and data uploaded to our products.

Retention of Personal Data

We will retain your personal information for the time necessary to provide the services we perform for you, or to achieve other purposes outlined in this Privacy Policy, and you can always request that we stop processing or delete your personal information (see the section below regarding your rights).

Your rights in respect of information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

Right of Access

You have the right at any time to ask us for a copy of the personal information about you that we hold. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

Right of Correction or Completion

Right of Erasure

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which

it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Right to object to or restrict processing

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

Right of Data Portability

In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

You can exercise any of the above rights by contacting us using any of the methods in the Contact section above.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details in the Contact section above.

Automated decision-making

- Where it is necessary to enter into or perform our contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated processing, unless we have a lawful basis for doing so, we have notified you and given you a right to challenge the decision or to require that the decision be taken by a person.

Complaints

If you are unhappy about our use of your personal information, you can contact us using the details in the Contact section below. You are also entitled to lodge a complaint with
using any of the below contact methods:
Telephone:
Website:
Post:
If you live or work outside the KSA or you have a complaint concerning our activities outside
the KSA, you may prefer to lodge a complaint with a different supervisory authority. A list of
relevant authorities