

## **Principles Relating to Processing of Personal Data for Alive Verify User Account**

### **1. Table of Contents**

### **2. Introductory Provisions**

- 2.1. These Principles Relating to Processing of Personal Data for Alive Verify User Account (the “**Principles**”) are intended for all users of Alive Verify user accounts (the “**User Account**”).
- 2.2. The User Account is operated by and the data controller is GTS ALIVE ME DMCC, with its registered office at Unit No: 3928, DMCC Business Centre, Level No 1, Jewellery & Gemplex 3, P. O. Box: 392173, Dubai, United Arab Emirates, Licence Number: DMCC-073822, Registration Number: DMCC39822, Tax Registration Number: 100426366900003 (“**GTS**”).
- 2.3. The use of the User Account shall be governed by [the Alive Verify User Account Terms of Use](#) (the “**Terms of Use**”).
- 2.4. In giving his or her consent to the Terms of Use, the User takes note of the contents of these Principles and declares that he or she understands everything and that he or she has been properly informed about the processing. In case of a legal entity that is represented by several individuals, the User undertakes to inform all other Users about the wording of these Principles.
- 2.5. The purpose of these Principles is to provide complete information about the processing of User’s personal data in connection with the use of the User Account, including the fulfillment of any information requirements within the meaning of Articles 13 and 14 of the General Data Protection Regulation (the “**GDPR**”) as well as principles and regulations outlined applicable:
  - in the UAE namely the Federal Law No. 2 of 2019 on the Protection of Personal Data (PDPA),
  - in Kuwait, namely the Consumer Protection Law (Law No. 39 of 2014) and further regulations,
  - in Oman, namely the Electronic Transactions Law (Royal Decree No. 69/2008) and further regulations,
  - in Bahrain, namely the Personal Data Protection Law (Law No. 30 of 2018) and further regulations,
  - in Qatar, namely the Law No. 13 of 2016 on the Protection of Personal Data and further regulations,
  - in Saudi, namely the Saudi Arabian Standards Organization (SASO) and further regulations.
- 2.6. If the User has any questions prior to accepting these Principles, he or she shall contact GTS using the below contact details.

### **3. Data Controller, Data Protection Officer, and Contact Details**

- 3.1. GTS shall act as data controller;
- 3.2. Contact details of GTS are as follows:
  - 3.2.1. Written communications: GTS ALIVE ME DMCC, Unit No: 3928, DMCC Business Centre, Level No 1, Jewellery & Gemplex 3, P. O. Box: 392173, Dubai, United Arab Emirates
  - 3.2.2. Email communications: [info@mystudentcard.org](mailto:info@mystudentcard.org)

### **4. User Account**

- 4.1. Purpose: GTS provides services to the User in the form of the User Account; User Account functionalities are specified in the Terms of Use. User’s personal data are processed with a view to ensure all functionalities and of the service under the [Terms of Use](#). As such, User’s

personal data are namely used for the purpose of maintaining his or her User Account, provision of all services and functionalities, and for record-keeping purposes. Upon registration, GTS may send a verification email and other technical notices and messages that might be necessary for the operation of the service, particularly information about changes to legal documents, services, availability of services, etc. Legal basis for the processing: performance of a contract; GTS cannot provide the relevant services to the User without such processing.

- 4.2. Categories of personal data concerned: identification data, contact details, data relating to the User Account and login information, logs, network identifiers, IP address, information about functions used, and any and all data relating to the User Account and User activity.
- 4.3. Data recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 4.4. Transfers to third countries: No
- 4.5. Period for which the personal data are stored: throughout the existence of the User Account or throughout the term of a contract or other agreement for the provision of benefits to cardholders, as appropriate. Following contract termination (whether by the User or GTS), data shall only be retained for the purpose of the below specified [legitimate interests](#) and/or [for complying with a legal obligation](#).

## 5. Legitimate Interest

- 5.1. Purpose: In the event GTS carries out the above processing, then, following the termination thereof, it collects limited documents and personal data in order to protect its own rights, defend any claims made, and for its defense during court/administrative/control or other proceedings.
- 5.2. Legal basis for the processing: legitimate interest of GTS with a view to protect its rights, document compliance and defend itself in respect of supervisory authorities. **You may object to this legitimate interest at any time.**
- 5.3. Categories of personal data concerned: evidence of legal acts, such as granted consents, relevant logs, submitted requests to exercise rights, data on proper provision of services, and material data relating to the User Account and services.
- 5.4. Recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 5.5. Period for which the personal data are stored: GTS shall retain such collected data for a period of 3 years from the expiry of the processing period set down by another purpose under these Principles. The period shall not end before any initiated court or other proceedings and associated deadlines for any appeals.

## 6. Compliance with Legal Obligations

- 6.1. Purpose: If GTS is required to retain certain documents under the applicable legislation, it does so for the purpose specified by such legislation. One example is the retention of documents relating to tax and accounting agenda.
- 6.2. Legal basis for the processing: compliance with a legal obligation.
- 6.3. Categories of personal data concerned: only such data or documents that are to be retained under the applicable legislation.
- 6.4. Recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 6.5. Period for which the personal data are stored: GTS shall only retain such collected data for a period defined by the applicable legislation.

## **7. User's Rights and Exercising Such Rights**

- 7.1. To ensure an adequate level of the security of data processing and protection of personal data, GTS has implemented appropriate technical and organizational measures that are in line with the current level of development of technical means, which facilitate the security of data processing, particularly the prevention of unauthorized access to or unauthorized use or theft of personal data.
- 7.2. Any processing of personal data shall respect User's rights guaranteed by this article.
- 7.3. Right of access to personal data – your right to obtain from GTS, without undue delay, information about which personal data are being processed, purpose of processing, recipients, retention period, and information about associated rights.
- 7.4. Right to rectification – right to obtain from GTS, without undue delay, the rectification of inaccurate personal data or completion of any incomplete data.
- 7.5. Right to erasure ("right to be forgotten") - right to obtain from GTS, without undue delay, the erasure of your personal data.
- 7.6. Right to restriction of processing of your personal data – right of the User to obtain from GTS restriction of processing, provided the requirements of Article 18 of the GDPR are met (e.g. accuracy of personal data is contested, the User has objected to processing, etc.).
- 7.7. Right to data portability - right to receive the personal data concerning you, which you have provided to GTS and which are processed by automated means on the basis of your consent or a contract, in a structured, commonly used and machine-readable format, and the right to transmit such data to another controller or to have the personal data transmitted directly to another controller, where technically feasible.
- 7.8. Right to object to processing of personal data that concern you. GTS shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims. Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which also includes profiling. If you object to such processing, your personal data will no longer be processed for such purposes.
- 7.9. You have the right not to be subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. GTS does not base any of its decisions solely on automated processing.
- 7.10. You can request partial or complete erasure or blocking of your personal data at any time and free of charge; you can also request information about personal data concerning you that we store and apply for the rectification of such data. It is not necessary to use a specific form for this purpose; you can simply contact us using the above contact details.
- 7.11. We will handle all your requests without undue delay, but in any case no later than 30 days in duly justified cases.
- 7.12. If you wish to exercise your right, in your capacity of data subject, with regard to GTS, in its capacity of controller, or if you wish to submit any requests, inquiries or complaints relating to the processing of personal data, use our [contact details](#).

## **8. Final Provisions**

- 8.1. The processing of personal data of Users shall be governed by the laws of the United Arab Emirates.
- 8.2. These Principles are effective as of 1<sup>st</sup> of May 2023.

- 8.3. GTS may amend these Principles as and when necessary. Any such changes shall be effective on the date of notification or on a later date specified in the notification thereof. Changes shall be notified electronically. The User may reject any such changes and terminate the use of the services in accordance with the Terms of Use as well as the processing of personal data under these Principles, as of the effective date of such changes.