

# Privacy Policy

## Introduction

This Privacy Policy describes how “Aura ProTech Consulting FZ LLC” (henceforth referred to as “Company”) collects, uses, stores, discloses, and otherwise processes personal data obtained when you access or use our websites and applications that display or reference this Privacy Policy, create or administer an account, or use our services, as well as when you visit our branded social media pages, register for, attend, or participate in our events, webinars, or contests, or otherwise communicate or interact with us in person or by email, text message, instant messaging, telephone, or other electronic means. It further sets out the rights and choices available to you in relation to your personal data and explains how you may contact the Company in the event of any questions or concerns regarding this Privacy Policy or our handling of your personal data.

This Privacy Policy does not apply to the processing of personal data that the Company carries out on behalf of its business customers in the capacity of a service provider or processor. Such processing is governed exclusively by the applicable agreement(s) between the Company and its respective business customers.

Please read this Privacy Policy carefully. If you do not agree with its terms, you must refrain from using our website or services and from otherwise providing us with your personal data. By accessing or using our website or services, or by otherwise providing us with your personal data, you acknowledge that you have read, understood, and accepted this Privacy Policy. Your use of our website and services is also subject to our Terms of Service (as amended from time to time).

This Privacy Policy is effective as of the date first indicated above. The Company may revise or update this Privacy Policy from time to time. When changes are made, the updated Privacy Policy will be posted on this page or on another page that links to this page, and the “last updated” date at the top of the webpage will be revised. You are encouraged to review this Privacy Policy periodically and in any event each time you access our website, in order to stay informed about our information practices. Where changes materially affect the manner in which we use or disclose your personal data, we will provide prior notice of such changes by means of a notice on this website (or by any other method required under applicable law) before the revisions become effective. Your continued use of the website or our services after such changes have been posted or notified will constitute your deemed acceptance of the revised Privacy Policy.

## Key Definitions

Below are commonly used definition clauses you can adapt for your privacy policy. Adjust terms to match how “company” actually operates and keep them consistent with UAE PDPL terminology.

### Defined terms

- **“Aura ProTech Consulting FZ LLC” “Company”, “we”, “us”, “our”:** Means Aura ProTech Consulting FZ LLC, including any successors and permitted assigns, acting as controller or processor of personal data, as applicable.
- **“You”, “your”, “data subject”:** Means any identified or identifiable natural person whose personal data are processed by or on behalf of the Company, including website visitors, users of the Services, representatives of customers, prospects, suppliers, and other business contacts.
- **Personal data:** Means any information relating to an identified natural person or a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, voice, image, identification number, online identifier, geographical location, or to one or more physical, physiological, economic, cultural or social characteristics.

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- **Sensitive personal data:** Means any personal data that directly or indirectly reveals a natural person's family, ethnic origin, political or philosophical opinions, religious beliefs, criminal record, biometric identifiers, health data, or any other categories defined as sensitive under applicable data protection laws.
- **"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 by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Controller:** Means the natural or legal person who determines the purposes and means of processing personal data, alone or jointly with others.
- **Processor:** Means the natural or legal person who processes personal data on behalf of the controller, in accordance with the controller's documented instructions.
- **Services:** Means the digital marketing, cybersecurity, consulting, training, manpower-related or other professional services that the Company offers or provides, including associated portals, platforms, tools, and support.
- **Website:** Means any website or web page operated, maintained, or controlled by the Company that links to or references this Privacy Policy.
- **Applicable law:** Means all data protection and privacy laws and regulations that apply to the Company's processing of personal data, including, where relevant, the UAE Federal Decree-Law on the Protection of Personal Data (PDPL) and any implementing regulations, as well as any other local or sector-specific data protection requirements.
- **Consent:** Means any freely given, specific, informed, and unambiguous indication of the data subject's wishes, by a statement or by a clear affirmative action, which signifies agreement to the processing of personal data relating to him or her, in line with applicable data protection law.
- **Third party:** Means any natural or legal person, public authority, agency, or body other than the data subject, the Company, or persons who, under the direct authority of the Company, are authorized to process personal data.
- **Cross-border transfer:** Means any communication, copying, transmission, disclosure, or access to personal data to or from a country or territory outside the United Arab Emirates, including remote access from such locations.
- **Personal data breach:** Means any unauthorized or unlawful access to, destruction, loss, alteration, disclosure of, or
- **Affiliates:** Means entities in our group who are listed in this Privacy Policy (please read the Affiliates section).
- **"Privacy Policy"** refers to this Privacy Policy.

## Who We Are

The "Company", "we", "our", or "us" refers to the service company providing as listed below under the license from RAKEZ:

- Digital Marketing services (such as online advertising, campaign management, and analytics)
- Cybersecurity services (such as penetration testing, security assessments, and advisory)
- Manpower Management services (such as recruitment, staffing, and HR support)
- Data Privacy Compliance and Consulting: Data Privacy compliance readiness and support services
- Artificial Intelligence Development
- Data Classification & Analysis Services: Services involve systematically organizing data into defined categories based on its sensitivity, business value, and usage.
- Manpower Management and HR Consultancy Services

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- Investment consultancy: Services offer professional advice on portfolio diversification, risk assessment, regulatory compliance, and strategic investment opportunities tailored to client financial goals in UAE and global markets

The Company is the data controller for personal data collected through the website and in connection with its services, except where the Company processes personal data solely on behalf of a client, in which case it acts as a data processor.

## Scope of This Policy

This Privacy Policy applies to:

- Visitors to the Company website and digital channels
- Prospective clients, existing clients, and their representatives
- Job applicants, contractors, and candidates for Manpower Management services
- Individuals whose data are processed as part of Digital Marketing or Cybersecurity engagements, to the extent the Company acts as controller

Where the Company processes personal data strictly under instructions from its clients (for example, as part of security testing, HR outsourcing, or campaign execution), the client's privacy policy and data processing terms may also apply.

## Types of Information Collected

The Company may collect the following categories of personal data, depending on the interaction:

- Identification data: name, title, employer, job role, signature.
- Contact data: email address, phone number, postal address, country, communication preferences.
- Website and technical data: IP address, device identifiers, browser type, operating system, referral URLs, pages viewed, time and date of visits, and other analytics data collected via cookies or similar technologies.
- Marketing and communication data: marketing preferences, responses to campaigns, form submissions, survey responses, and communication history.
- Service-related data (cybersecurity): user account identifiers, log files, system information, security event data, vulnerability information, and test results, to the extent these data can identify a person.
- Service-related data (manpower): CVs, work history, qualifications, skills, references, identification numbers where permitted by law, expected salary, and interview notes.
- Financial and transactional data: limited billing details such as invoicing contact, bank details if required for payment processing, and transaction records.

The Company does not intentionally collect sensitive data (such as health information or biometric data) unless explicitly required for a clearly defined purpose and permitted by law, in which case additional safeguards and notices will be provided.

### How data is collected

Personal data may be collected through:

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- Direct interactions: when individuals fill in forms on the website, contact the Company by email or phone, subscribe to newsletters, register for events or webinars, or engage in contractual discussions.
- Website and cookies: through cookies, pixels, tags, and similar technologies that collect technical and usage data for performance, security, and marketing purposes.
- Service delivery: through the performance of Digital Marketing, Cybersecurity, and Manpower Management services, including information provided by clients about their staff, candidates, contractors, or users.
- Third-party sources: from professional networking sites, job boards, marketing partners, data enrichment services, and publicly available sources where permitted by law.

## Purpose & Legal Bases of Processing

Personal data is processed only when there is a valid legal basis under applicable data protection laws, which may include consent, performance of a contract, compliance with legal obligations, and legitimate interests.

Key purposes include:

- Providing and managing services: to deliver Digital Marketing, Cybersecurity, and Manpower Management services, including scoping, implementation, reporting, billing, and client support.
- Website operation and security: to operate, secure, and improve the website, diagnose technical issues, detect and prevent fraud or cyberattacks, and ensure availability and performance.
- Marketing and communications: to send service information, newsletters, event invitations, and marketing communications consistent with stated preferences, and to measure the effectiveness of campaigns.
- Recruitment and manpower: to assess candidates, manage recruitment pipelines, perform background and reference checks where lawful, and place candidates with client organizations.
- Legal and regulatory compliance: to comply with legal obligations, respond to lawful requests from authorities, manage disputes, and enforce contractual rights.

Where required, consent is obtained before using cookies for non-essential purposes or sending direct electronic marketing to individuals, and individuals may withdraw consent at any time without affecting previous lawful processing.

## Cookies and similar technologies

The website uses cookies and similar technologies (such as pixels and tags) to:

- Enable core site functions and security
- Understand how visitors use the website and improve user experience
- Support analytics and performance measurement
- Enable or measure digital advertising and retargeting where applicable

Visitors will be informed about the categories of cookies used and the purposes for which they operate, and where required by law, a consent banner or settings panel will allow users to accept, reject, or customize cookie preferences.

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### How data is used in digital marketing

For Digital Marketing services, personal data may be used to:

- Create, manage, and optimize advertising campaigns across online channels, including social media, search engines, and email marketing platforms
- Segment audiences, build custom or lookalike audiences where permitted, and measure campaign performance and conversions

Data used for such activities may include contact details, engagement metrics, cookies or device identifiers, and interactions with Company communications, always considering applicable consent and opt-out requirements. Where the Company acts as a processor on behalf of clients, it follows the client's instructions and contractual data processing terms, including restrictions on audience building and re-use of data.

### How data is used in cybersecurity services

In Cybersecurity engagements, the Company may process system logs, user identifiers, IP addresses, configuration data, and security event information to:

- Conduct security assessments, penetration tests, vulnerability scans, and threat simulations
- Monitor, investigate, and report on security incidents and vulnerabilities identified during engagements

Where possible, testing is performed on non-production or pseudonymized data, and personal data exposure is limited to what is necessary for the agreed scope. Any personal data accessed during security testing is used solely for testing, reporting, and remediation support, and is handled under strict confidentiality and security obligations.

### How data is used in manpower management

For Manpower Management services, the Company processes candidate and workforce data to:

- Evaluate suitability for roles, match candidates to opportunities, and manage staffing pipelines
- Communicate about job opportunities, coordinate interviews, negotiate offers, and onboard selected candidates

Information may be shared with client organizations for assessment and hiring decisions, subject to confidentiality commitments and only to the extent necessary for these purposes.

Where required by law or contract, additional checks (for example, reference or background checks) may be carried out in accordance with local legal requirements.

### Data sharing and recipients

The Company does not sell personal data.

Personal data may be shared with the following categories of recipients:

- Clients and client affiliates: to the extent required to deliver contracted services (for example, candidate profiles, security reports, marketing campaign results).
- Service providers and vendors: such as hosting providers, analytics tools, marketing platforms, CRM systems, email and SMS providers, and professional advisers (lawyers, auditors).

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- Group companies: where the Company is part of a group, with affiliates that support service delivery, sales, marketing, or operations, under appropriate safeguards.
- Authorities and legal entities: where required to comply with applicable laws, regulations, court orders, or to protect rights, property, or safety.

All third parties that process personal data on behalf of the Company are bound by contractual obligations to protect personal data and to use it only for the permitted purposes.

### International data transfers

Personal data may be transferred to and processed in countries outside the individual's country of residence, including locations where data protection laws may differ or offer a different level of protection.

Where such transfers occur, the Company implements appropriate safeguards as required by law, such as contractual data protection clauses, and ensures that transferred data remains subject to protections consistent with this Privacy Policy.

### Data retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, or as required by law, regulation, or contractual obligations.

Retention periods may vary based on the type of data and context, for example:

- Marketing and website data: kept for a period aligned with engagement cycles and analytics needs, then anonymized or deleted
- Service records (cybersecurity, manpower, contracts, invoices): retained for the duration of the engagement and for a reasonable period afterwards for legal, audit, and business continuity reasons
- Recruitment data: retained for a defined period to consider candidates for current and future roles, unless the individual requests deletion where permitted

### Data security

The Company uses technical and organizational measures designed to protect personal data against unauthorized access, disclosure, alteration, or destruction.

Measures may include access controls, encryption where appropriate, network and application security, secure development practices, logging and monitoring, staff training, and incident response procedures consistent with industry standards.

Despite these measures, no system can be completely secure, and individuals should take care when transmitting information over the internet.

### Visitors' rights

Depending on applicable law, individuals may have some or all the following rights concerning their personal data:

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- Right of access: to obtain confirmation of whether personal data is processed and to receive a copy.
- Right to rectification: to correct inaccurate or incomplete data.
- Right to erasure: to request deletion in certain circumstances.
- Right to restriction: to request limited processing in specific situations.
- Right to data portability: to receive personal data in a structured, commonly used format where applicable.
- Right to object: to object to certain processing activities, including direct marketing.
- Right to withdraw consent: where processing is based on consent, the right to withdraw it at any time.

Requests to exercise these rights can be made using the contact details provided in this Policy, and the Company will respond in accordance with applicable laws, subject to verification of identity and legal limitations.

### Marketing communications and opt-out

The Company may use contact details to send information about services, insights, events, or promotions that may be relevant to the recipient's professional interests.

Recipients may opt out of these communications at any time by using the unsubscribe link in emails or by contacting the Company directly; essential service and transactional communications may still be sent even if marketing is declined.

### Children's privacy

The website and services are not directed to children, and the Company does not knowingly collect personal data from individuals under the age defined by applicable law without appropriate consent.

If it is discovered that such data has been collected without required consent, reasonable steps will be taken to delete it as soon as practicable.

### Third-party websites and services

The website may contain links to third-party websites, platforms, or services that are not controlled by the Company. This Privacy Policy does not apply to those third parties, and individuals should review the privacy policies of any third-party sites or services they visit or use.

### Changes to this Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in legal requirements, technology, or the Company's services and practices.

The "last updated" date will be revised accordingly, and significant changes may be communicated through the website or direct notice where required by law.

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### Contact details

Aura ProTech Consulting FZ/LLC is entirely responsible for the processing of your personal data under this Privacy Policy (as controllers, where provided under applicable law).

If you have any questions or concerns regarding Aura ProTech Consulting FZ/LLC's Privacy Policy or use of personal data, or if you want to exercise your rights regarding your personal data, please contact us by email at our designated request address at [soham.bublikwar@auraprotechconsulting.com](mailto:soham.bublikwar@auraprotechconsulting.com) or by regular mail to:

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