

## PRIVACY POLICY

### 1. INTRODUCTION

**Code Engines Software LLC** is a company incorporated under the laws of United Arab Emirates having its registered office at Office 2409, 24<sup>th</sup> Floor, Churchill Tower, Business Bay Dubai, UAE. *[hereinafter referred to as "We" or "Us" or "Company" or "CASENGINE"]*.

We offer a legal task automation system through our website [www.casengine.app] and mobile application. Our services include bilingual support *[Arabic and English]*, task automation, reminders, case docketing, email notifications, etc.

In accordance with all applicable laws, we have created this Privacy Policy *[Hereinafter referred to as "Privacy Policy" or "Policy" or "Privacy Statement"]* in order to demonstrate our privacy commitment to any individual or entity whose data we collect, store or process for providing or offering our services on our website or mobile application.

### 2. APPLICABILITY

This Policy applies to all our mobile application users, visitors to our website, and other individuals and entities who provide their personal or commercial information to **CASENGINE**. All such users, visitors and other individuals as well as entities are hereinafter referred to as *"Data Subject"*.

### 3. OBJECTIVE

This Privacy Policy, as mentioned above, is intended to inform the **Data Subject** on how we gather, define, and use Commercial or Personal Data or Information that a **Data Subject** provides to **CASENGINE** when using our website, mobile application, social media platforms or when relying on our services.

This Privacy Policy also covers our treatment of any Commercial or Personal Data or Information that third parties share with **CASENGINE**.

Why do we collect **Data Subject**?

(1) help direct you to products and services which may be of interest to you; and

(2) contact you with information and offers, suggestions and recommendations of products and services which may be of interest to you from either **CASENGINE**, its affiliates or its partners.

This Privacy Policy will primarily help a **Data Subject** understand:

- (a) The nature of information we collect about a **Data Subject** directly or through third parties;
- (b) The sources from where a **Data Subject's** information is collected;
- (c) The manner in which a **Data Subject's** information is collected;
- (d) The purpose of collecting a **Data Subject's** information;
- (e) The manner in which a **Data Subject's** information is stored, used and processed by **CASENGINE**;
- (f) The rights a **Data Subject** has under applicable laws regarding such information collected by **CASENGINE**;
- (g) The process to contact **CASENGINE** for any issues regarding the collection or use of a **Data Subject's** information.

A **Data Subject's** Information collected by **CASENGINE** primarily consists of:

- Personal Information;
- Commercial Information;
- Sensitive Commercial Information; and
- Sensitive Personal Information.
- Device Information

*[Collectively referred to as "Information" or "Data Subject Information"].*

#### **A. Personal Information**

When a **Data Subject** creates an account on the **CASENGINE** mobile application or visits the **CASENGINE** website or mobile application or enters his/her information on any internet form owned by **CASENGINE**, we may directly collect or ask the **Data Subject** to provide Personal Information such as but not limited to Name, IP address, Location, email address, phone, behavioural or demographic attributes.

Please note that as a user of our website, you are responsible for keeping your login information including your password confidential. If you believe that your login information or password has been compromised or that someone else has accessed your account, please notify us immediately by contacting us at support@codengines.com

*{Note- Please see 'Our use of cookies' below for details of the cookies we use on our site.}*

Personal information means any information about a **Data Subject** from which that person can be identified. It does not include data where the identity has been removed [*anonymous data*] such as cookies, web beacons and other browsing information.

Browsing Information is information collected through cookies and web beacons to track what features or webpages you have viewed on our website or mobile application, and other information about your browser and browsing behaviour. We use browsing information to improve the design and content of our website and mobile application, to suggest content and products that we think may be relevant to you, and to help us learn things like what pages are most attractive to our visitors, and what promotions visitors like to see, and to gauge the success of our advertising campaigns.

Because cookies and web beacons are the technology generally driving collection of browsing information, you can also block cookies to control data collection related to interest-based advertising. You can typically do so through your browser. For instructions, check your browser's technical information. Preventing your browser from accepting cookies prevents the collection of your browsing information for purposes of delivering interest-based ads. However, it may also disable or interfere with other features on our website or mobile application. For example, cookies allow

us to remember your preferences when you logout of your account and then login again. Cookies also allow us to recognize you as an account holder when you return to our website or mobile application. Most browsers accept cookies automatically.

## **B. Commercial Information and Sensitive Commercial Information**

CASENGINE shall collect certain Commercial Information and Sensitive Commercial Information which the Data Subject may choose to provide to avail CASENGINE'S services. Such information shall include, but not be limited to legal data related to users Clients, matters and cases.

## **C. Sensitive Personal Information**

Certain categories of personal information, such as financial record, health or biometric information, sexual orientation, etc. are considered to be Sensitive Personal Information. **Data Subject** may choose to share **his or her** Sensitive Personal Information with **CASENGINE** directly in certain circumstances.

**CASENGINE** collects and processes Sensitive Personal Information only when it is essential to offer its services to the **Data Subject**.

By providing **his or her** Sensitive Personal Information, the **Data Subject** agrees that we may collect, use and share this information with third parties for the purpose of processing **Data Subject's** service request[s].

## **D. Device Information**

We collect data related to the user's device from which he is accessing our services such as Device ID, Device Name, Firmware details and permission to record audio.

## **4. HOW WE COLLECT DATA SUBJECT INFORMATION**

We collect Information about **Data Subject** through the following means:

- (a) whenever a **Data Subject** uses our services [whether services provided directly by **CASENGINE** or by other companies acting on our behalf];

- (b) when **Data Subject** downloads our mobile application and/or creates an account on the mobile application;
- (c) when **Data Subject** visits our website and/or creates an account on the website;
- (d) when **Data Subject** interacts with our staff;
- (e) when **Data Subject** interacts with **CASENGINE** via email or social media platforms.

## 5. WHY WE COLLECT DATA SUBJECT INFORMATION

We use **Data Subject Information** to conduct our business and to provide **Data Subject** with the best possible services and user experience. We will only use **Data Subject Information** based on this Privacy Policy, our contract with the Data Subject, and when the law allows **CASENGINE** to.

**CASENGINE** will collect adequate, relevant and necessary **Data Subject Information** and will process such information fairly and lawfully for the purpose it is collected. Most commonly, **CASENGINE** will use **Data Subject Information** in the following circumstances:

- (a) Where we need to perform the contract, we have entered into with the **Data Subject**;
- (b) Where we need to comply with a legal obligation;
- (c) Where it is necessary for our legitimate interests *[or those of a third party]* and the **Data Subject's** interests and fundamental rights do not override those interests;
- (d) To enable the **Data Subject's** use of our services;
- (e) To send statements, invoices and payment reminders to the **Data Subject**, and to collect payments from the **Data Subject**;
- (f) To send non-marketing commercial communications to the **Data Subject**;
- (g) To send the **Data Subject** and its clients email notifications that the **Data Subject** has specifically requested for;
- (h) To send **Data Subject** marketing communications relating to our business or the businesses of carefully selected third parties which we think may be of interest to the **Data Subject**, where **Data Subject** has specifically agreed to this, by email or similar technology. However, the **Data Subject** can inform **CASENGINE** at any time if

the **Data Subject** no longer requires such marketing communications;

- (i) To deal with enquiries and complaints made by or about the **Data Subject** relating to services provided;
- (j) To improve and customise our services in accordance with the Data Subject's preferences to ensure that content is presented in the most effective manner;
- (k) To allow you to participate in interactive features of our services when you choose to do so;
- (l) To analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices) and improve your online experience;
- (m) To keep our website, mobile application and other systems secure and to prevent fraud;
- (n) Where the **Data Subject** has given **CASENGINE** explicit consent to do so.

We need the information you provide directly to us or by filling in any of the forms on our site to:

- (a) Direct you to products and/or services which may be of interest to you;
- (b) Contact you with information and offers, suggestions and recommendations of products and/or services which may be of interest to you;
- (c) Contact you about those products and/or services on our site in which you have expressed an interest;
- (d) Provide our services to you;
- (e) Comply with our regulatory or legislative requirements;

**Note:** *You do not have to give us any information or confirm that the information we have obtained from other sources is correct.*

We may also use **Data Subject Information** in the following situations, which are likely to be rare:

- (a) Where we need to protect the **Data Subject's** interests *[or someone else's interests]*;
- (b) Where it is needed in the public interest or for official purposes or to fulfil a legal obligation. For instance, requests made by law enforcement agencies, courts or tribunals.

## 6. FAILURE TO PROVIDE INFORMATION

If a **Data Subject** fails to provide certain Information when requested, we may not be able to perform the contract we have entered into with the **Data Subject**, or we may be prevented from complying with our legal obligations.

The **Data Subject** hereby accepts and agrees that we shall not be held liable in any manner whatsoever if we are unable to perform our services or if there is a deficiency in our services to the **Data Subject** due to **Data Subject's** failure to provide such information.

The **Data Subject** agrees that he/she/it shall not file or initiate any complaints, legal proceedings or claims against **CASENGINE** and/or our employees, directors, associates, etc. in this regard. The **Data Subject** further agrees to indemnify and hold **CASENGINE** and/or our employees, directors, associates, etc. harmless from any complaints, legal proceedings or claims filed or initiated by any third party against **CASENGINE** in this regard.

## 7. CHANGE OF PURPOSE

We will only use **Data Subject Information** for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use **Data Subject Information** for an unrelated purpose, we will notify the **Data Subject** and we will explain the legal basis which allows **CASENGINE** to do so.

Please note that we may process **Data Subject Information** without **Data Subject's** knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 8. CONSENT

**Data Subject** agrees that we do not need any additional or further consent from **him/her** to use **Data Subject Information** in accordance with this Policy to carry out our legal obligations or exercise specific rights.

## 9. INFORMATION SHARING AND DISCLOSURE

We may disclose **Data Subject Information** to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy and for the purpose of providing services to **Data Subject**.

We may disclose **Data Subject Information** to any member of our company, including our subsidiaries and partners, insofar as reasonably necessary for the purposes set out in this Policy. Information shared with third parties will not contain any Commercial Information or Sensitive Commercial Information.

In some cases, we may choose to buy or sell business assets. In these types of transactions, user information is typically one of the transferred business assets. If we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your personal information as set out in this Privacy Policy.

In addition to this, we may disclose **Data Subject Information**:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;



- (c) in order to establish, exercise or defend our legal rights including providing information to others for the purposes of fraud prevention and reducing credit risk;
- (d) to the purchaser or prospective purchaser of any business or asset that we are or are contemplating selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that information.

Except as provided in this Policy, we will not provide **Data Subject Information** to any other third party.

#### **WHERE IS YOUR INFORMATION STORED?**

Your information is stored on servers and filing systems which are hosted on Microsoft Azure Cloud and 3rd party Servers.

#### **HOW DO WE PROTECT YOUR DATA SUBJECT?**

### **10. DATA SECURITY**

We are committed to protecting **Data Subject Information** and thus implement appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

Appropriate physical, electronic, and managerial procedures have been put in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information collected from **Data Subject**.

**CASENGINE** is concerned with keeping your **Data Subject** secure and protecting it from unauthorized disclosure. We implement a variety of security measures to ensure the security of your **Data Subject** on our systems, including extensive

due diligence on our code and run periodically vulnerability tests to make sure our applications and your **Data Subject** is always safe and secure.

We use enhanced security on top of our Virtual Machines including locked-down firewalls, read-only file systems and limited user accounts with disabled root login. Any **Data Subject** collected by us is contained behind secured networks and is only accessible by a very limited number of employees who have special access rights to such systems and whom are subject to strict confidentiality obligations. Where **Data Subject** is collected by us it will be transmitted and protected via a secure protocol and encrypted in our databases to be accessed only as stated above.

If and when we use subcontractors to store your **Data Subject**, we enter into written agreements with them which comply with applicable **Data Subject** protection law to help ensure the security of your personal data is within best international standards. Unfortunately, no transmission of **Data Subject** over the internet is guaranteed to be completely secure, however we do encrypt the data via https. It may be possible for unauthorized third parties, to intercept or access transmissions or private communications unlawfully. While we strive to protect your **Data Subject**, we cannot ensure or warrant the security of any **Data Subject** you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

## 11. DATA RETENTION

We will only retain **Data Subject Information** for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise **Data Subject Information** so that it can no longer be associated with the **Data Subject**, in which case we may use such information without a further statement to **Data Subject**.

If you have an online account with us or provide information directly to us by filling in the forms on our site or via social media, we will keep your information

for no more than five years from the date you cease to have any active accounts with us. We keep your information for this long so that we can:

- (a) ensure we contact you with information on products, services, suggestions, offers and recommendations relevant and appropriate to you;
- (b) deal with any issues or concerns that you may have about how we handled your account;
- (c) bring or defend any legal claims;
- (d) comply with regulatory audit requirements;

## 12. WHO HANDLES AND RETAINS DATA SUBJECT INFORMATION

Details about the primary entity which handles and retains Data Subject Information is provided below:

- **Code Engines Software LLC**, located at Office 2409, 24<sup>th</sup> Floor, Churchill Tower, Business Bay Dubai, UAE.

## 13. DELETION OF INFORMATION

**Data Subject** may at any time ask **CASENGINE** to delete **Data Subject Information**. We will consider and where necessary comply with **Data Subject's** request in accordance with applicable law, as explained above. Please note that after deleting the information, we may not be able to provide our services to the **Data Subject**.

We may, however, need to retain certain **Data Subject Information** for recordkeeping purposes and/or to complete any transactions that the **Data Subject** began prior to requesting deletion of the information. For instance, when a **Data Subject** participates in a promotion, he/she/it may not be able to change or delete the Personal Information provided to **CASENGINE** until after the completion of such promotion.

There may also be residual information that will remain within our databases and other records, which will not be removed. In addition to this, there may be certain **Data Subject Information** which we maybe unable to delete due to legitimate and legal reasons.

**Data Subject** hereby accepts and agrees that we shall not be held liable in any manner whatsoever if we are unable to perform our services or if there is a deficiency in our services to **Data Subject** due to Data Subject's withdrawal of consent.

**Data Subject** agrees that he/she/it shall not file or initiate any complaints, legal proceedings or claims against **CASENGINE** and/or our employees, directors, associates, etc. in this regard. **Data Subject** further agrees to indemnify and hold **CASENGINE** and/or our employees, directors, associates, etc. harmless from any complaints, legal proceedings or claims filed or initiated by any third party against **CASENGINE** in this regard.

#### 14. WHAT RIGHTS DO YOU HAVE?

Under the data protection rules, you have a number of rights in respect of your information, which include the right to:

- (a) access your information;
- (b) withdraw your consent to the processing of your information at any time;
- (c) ask us to make changes to the information we hold about you to make sure that it is accurate and up to date;
- (d) delete or erase your information (*sometimes called the right to be forgotten*);
- (e) stop or restrict our processing of your information;
- (f) object to our processing your information;
- (g) not be subject to automated decision-making;
- (h) request the transfer of some of the information we hold about you (*known as data portability*);

If you would like to exercise any of your rights, please contact us at [legal@codengines.com](mailto:legal@codengines.com). Please note that an archive copy of any information provided to us may be retained by us for our records and for audit purposes.

You have the right to request a copy of the information we hold about you by sending your request in writing to us at [legal@codengines.com](mailto:legal@codengines.com)

You can unsubscribe from our emails at any time by clicking on “unsubscribe” at the bottom of the email.

You can typically remove and reject cookies from our website with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it may affect how our website works for you. Please see ‘Our Use of cookies’ below.

## 15. WITHDRAWAL OF CONSENT

**Data Subject** may at any time revoke or withdraw **Data Subject’s** consent to provide **Data Subject Information** to **CASENGINE** by using the applicable contact details set out at the end of this Policy. However, such action may render it impossible for **CASENGINE** to offer its services to the **Data Subject** any further.

**Data Subject** hereby accepts and agrees that we shall not be held liable in any manner whatsoever if we are unable to perform our services or if there is a deficiency in our services to **Data Subject** due to **Data Subject’s** withdrawal of consent.

**Data Subject** agrees that he/she/it shall not file or initiate any complaints, legal proceedings or claims against **CASENGINE** and/or our employees, directors, associates, etc. in this regard. **Data Subject** further agrees to indemnify and hold **CASENGINE** and/or our employees, directors, associates, etc. harmless from any complaints, legal proceedings or claims filed or initiated by any third party against **CASENGINE** in this regard.

## 16. REVIEW OF INFORMATION

**Data Subject** can contact **CASENGINE** at any time requesting access to Data Subject Information for reviewing or requesting amendment to certain information that **Data Subject** considers to be incorrect or wrong. **CASENGINE** shall process such requests from **Data Subject** in accordance with applicable law.

## 17. CHANGES TO THIS PRIVACY POLICY

- (a) The Policy is subject to modification from time to time. If we decide to change our Policy, we will post those changes here so that the **Data Subject** will always know what information we gather, how we might use that information and whether we will disclose it to anyone.
- (b) We may also notify **Data Subject** in other ways from time to time about the processing of **Data Subject Information**.
- (c) Other changes including grammar or spelling corrections will automatically update the timestamp at the bottom of this document.

## 18. OUR USE OF COOKIES

### WHAT ARE COOKIES?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit our site. Our site recognizes those cookies on each subsequent visit, enabling our site to recognize you.

Unless you have adjusted your browser settings to refuse cookies (*and details of how to do this are signposted at the end of this policy*), our site will set cookies as soon as you visit our site.

### HOW AND WHY WE USE COOKIES?

We use cookies on our site to:

- recognize you whenever you visit our site;
- remember the notifications you've seen so that we don't show them to you again;
- allow you to navigate between pages efficiently;
- measure how you use our site so it can be updated and improved to give you the best possible experience on our site;

We use the following cookies on our site:

### **Functional cookies**

These non-essential cookies allow our site to remember choices you make. The information these cookies collect may be anonymized and they cannot track your browsing activity on other sites.

### **What is the purpose of this cookie**

You will see a pop-up cookies message when you first visit our site. We'll store a cookie so that your computer knows you've seen it and knows not to show it again. This expires after 30 days when you will see a pop-up cookie message again to remind you of this Data & Privacy Protection Policy and to ask you to consent again to our use of non-essential cookies.

### **How long this cookie lasts**

Valid unless deleted

### **Third party performance cookies**

These non-essential cookies collect information about how visitors use our site, for example which pages visitors go to most often and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and is therefore anonymous. It is only used to improve how a website works.

### **What is the purpose of this cookie**

We use Google Analytics to collect information about how you use our site.

We use the information to compile reports and to help us improve our site. The cookies collect information in an anonymous form, including the number of visitors to our site, where visitors have come to our site from and the pages they visited.

We don't allow Google to use or share our analytics data.

Google Analytics stores information about:

- the pages you visit on our site;
- the actions you perform on our site;
- how long you spend on each page;
- how you got to our site;
- what you click on while you're visiting our site;
- information about the browser and device you use to navigate our site, *(including an anonymized IP address)*;

We don't collect or store any personal information *(for example your name or address)* that can be used to identify who you are.

More details about how Google Analytics collects and processes data are available at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

Last updated on the 27<sup>th</sup> April 2020.